Quality assurance in higher education: some international trends

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Higher Education Conference
Oslo
22-23 January 2002

Paper in progress
Accuracy of all cited developments cannot be guaranteed.

Introduction

Higher education is increasingly subject to quality evaluation by external bodies. However, external processes are not the primary mechanism by which quality in higher education is assured. Day-to-day quality assurance derives from internal academic processes, which are not always explicit and transparent. External evaluation processes thus run parallel to established internal processes for assuring quality. There is an implicit assumption that external processes will become more systematic and transparent, not least as a result of producing documentation inevitably required by external processes. In general, the expectation is that external processes will augment internal procedures. Therefore, it is important to keep the relationship with internal processes in mind important when analysing external evaluation.

'Evaluation' is used here as an umbrella term for all forms of quality monitoring, assessment, audit, enhancement legitimation, endorsement or accreditation. Specific aims and purposes of quality evaluation will be explored below but, first, an outline of who the evaluators are.

Auspices

A crude classification of auspices of the evaluating agency suggest three significant dimensions (Figure 1):

- whether the agency is established or empowered by legislation (law, decree, statute). Statutory agencies are usually government departments, agencies that are ultimately responsible to a government department (education, science, employment, treasury) or bodies with delegated regulatory powers;

- whether the genesis of the agency is within or outside the higher education sector. Sector-initiated agencies are often established by the committee of rectors or a similar organisation, including international agencies such as the Association of European Universities (EUA) and the International Association of University Presidents (IAUP). Externally-initiated agencies tend to be government or state agencies or professional- or employment-linked evaluation agencies;

- the degree of independence of the agency, which might be measured by the extent to which agencies are expected to show allegiance to initiators, are put under pressure by funders, or are constrained in the methods and processes of operation.

Statutory

The New Zealand Qualifications Authority (NZQA), for example, is a crown agency empowered by the 1990 *Education Amendment Act* to require providers to develop and implement mechanisms that ensure they offer quality education to their clients. Although

able to develop its own methods of working it has been heavily influenced by government mandates.

In Sweden, the National Agency of Higher Education (Högskoleverket), which is a government agency funded by government money and established by law in 1995, has responsibility among other things for monitoring quality. However, it has a fair amount of autonomy to make its own enquiries and evaluations.

Figure 1: Key dimensions of auspices
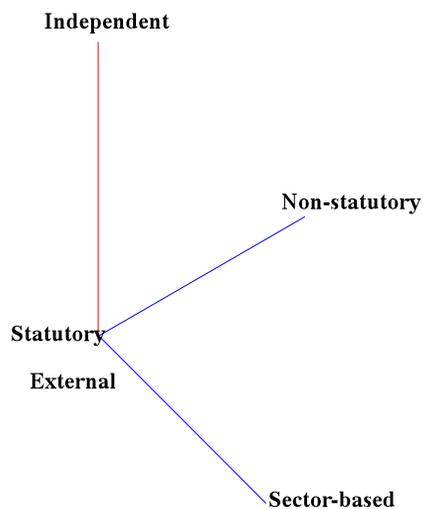
The Finnish Higher Education Evaluation Council also has legislative status and is funded by the Ministry of Education. It plays an advisory role as part of the Government Development Plan for Education and University Research for 1995–2000 and implements evaluations as part of this plan.

In the United Kingdom, there are regulatory bodies empowered by statute to control education in specific fields such as medicine (The General Medical Council) architecture (Architects Registration Council of the UK) and social work (Central Council for the Education and Training in Social Work). Their work, although affected by changes in legislation is almost entirely independent of direct government interference.

In Chile, The Consejo Superior de Educacion (CSE) was established by law as a public agency in 1990, partly government funded and partly funded by fees paid by institutions undergoing evaluation. Although chaired by the Ministry of Education with appointed council members it operated as an autonomous private organisation within the public system — the government does not control it, and the institutions do not own it.

Non-statutory

Institutional accreditation in the United States is a voluntary process undertaken by six regional bodies. The government recognises accreditation agencies as providing a framework for evaluating quality but they are not statutory bodies.

In South Africa, the Quality Promotion Unit of the South African Universities' Vice-Chancellors' Association (QPU), established in February 1996, was owned and paid for by the universities. It acted relatively independently of both government and the sector but its lack of statutory status resulted in it being wound up very rapidly when South Africa embarked on a review of its external monitoring processes.

The New Zealand Universities Academic Audit Unit, unlike NZQA, is a non-statutory agency with a governing board appointed by New Zealand Vice-Chancellor's Committee and is paid for, in part, by fees from the universities it audits. However, although established by the NZVCC, the Academic Audit Unit in New Zealand operates independently of the sector. Nonetheless, it cannot avoid being mindful of the government's 'value for money' expectations of the public sector. The New Zealand model was based on the Quality Audit Division of the Higher Education Quality Council (HEQC) set up by the Committee of Vice-Chancellors and Principals (CVCP) and subsequently absorbed into the Quality Assurance Agency (QAA). This shift from an initial system of quality assurance with roots in the institutions themselves to a systems operated by a national agency set up through legislation is indicative, Haakstad (2001) argues, of a general trend.

Another voluntary, non-statutory evaluation process is that established by the European Rectors' Conference(CRE) [now EUA], which provides a Europe-wide, sanction-free, auditing procedure available, for a fee, to institutions on request. The use of international teams of peer reviewers and the lack of pressure from state governments affords a good deal of independence to the process. There are other supra-national agencies emerging, mainly linked to accreditation, and discussed below. They tend, currently, to be non-statutory and independent.

In the United Kingdom, professional bodies validate and accredit programmes of study. Some have statutory powers, such as the Law Society who effectively control the flow of graduates into the legal profession. However, most professional bodies have no statutory powers, for example, recognition by the Institute of Financial Accountants is not a necessary prerequisite for a career in accountancy (Harvey & Mason, 1995). A similar, well-established, process of professional accreditation also takes place in the United States. For example, the Accreditation Board for Engineering and Technology undertakes visible and accountable inspections and graduates can only become licensed engineers if they graduate from accredited schools (Adelman & Silver, 1990). While, these agencies in the UK and US act independently of government, they act very much in the interest of the professional area.

The plethora of industry-originated, consultant-enabled, self-evaluation models provides another example of external, non-legislated evaluation. Having moved on from TQM the latest vogue in Europe is the Business Excellence model. These models appear to be independent, however, the consultants involved have a vested interest in 'selling' them.

Independence

Whether, in theory, the agency is independent the reality, in practice, will be mediated by the organisational ethos, culture, and working practices. Hence any mapping of independence status has to take account of the sociology of the organisation.

For example, Teaching Quality Assessment in England used to be the responsibility of the Quality Assessment Division of the Higher Education Funding Council for England (HEFCE). It was established in response to legislation that said the Council must ensure quality monitoring took place. However, the assessment process was not as closely controlled by government as this might imply. The Minister that set this process in train really wanted an inspection system but ended up with peer review. Although government initiated, HEFCE is not a government department but a 'quango' — a semi-independent appointed body, government funded, but autonomous in operation, delegated with a specific task which otherwise might be a civil service function. Furthermore, the quality function was the responsibility of the Quality Assessment Division (QAD), a division within a council primarily concerned with funding. So, as in any diverse organisation, QAD developed its own culture. In addition, the QAD was 'overseen' by an appointed steering committee made up of diverse people from higher education, industry and government. Finally, academics were used to do the assessments. All of this meant that despite its 'provenance', Teaching Quality Assessment, in practice, was a long way from being a government-controlled process. Indeed, the November 1997 budget letter to HEFCE stated 'the secretary of state expects the council to consider further ways of linking funding for teaching with assessment of quality' (Tysom, 1998, p. 48).

Similarly, most Central and Eastern European countries introduced accreditation mechanisms after the fall of communism in 1989–1990 (Frazer, 1997). Westerheijden (1995, 2001) argues that the main problems that had to be solved by these first-generation accreditation mechanisms included protecting the higher education system against what was seen as low-quality new (private) providers of study programmes, transforming study programmes in higher education towards a post-communist society and retaining central control while giving higher education establishments more autonomy. The ensuing programme accreditations involved setting standards for inputs, such as facilities, staff, and curricula. Although agencies close to government accredited programmes, the standards, Westerheijden (2001) argues, were defined *de facto* if not always *de jure* by the academic oligarchy. Official institutional accreditation thus creates a national system that both regulates and protects academia.

Thus, as a European Commission report suggests, 'the character of the process tends to be a different issue from, and independent of, the matter of formal ownership' (EC, 1998, p. 7). Although, independence is influenced by operational culture, it is also affected by

both the responsibilities to stakeholders and the boundary constraints of its work. The funding, terms of reference, degree of permanency, sanctions available and political agendas all impact on the responsiveness of the agency to the pressures placed upon it.

For example, in the UK, the new Quality Assurance Agency is, supposedly, independent. Yet it is clear from talking to civil servants in the Department for Education and Employment (DfEE) that they 'network closely' with the agency, indeed the head of the Higher Education Quality and Employability section of DfEE has been an active member of the QAA Board. There is a clear 'expectation' that QAA will be responsive to government priorities, a point no doubt reinforced in the occasional meetings between the Director of QAA and the Minister for Higher Education.

Delegated accountability

External quality evaluation is a characteristics of nearly all types of higher education system, including: the 'British model' of autonomous institutions also found throughout much of the Commonwealth; 'market systems' such as the USA and the Philippines; 'semi-market' systems such as Taiwan and Brazil; the 'Continental model' of 'centralised-autonomy' found in much of Western Europe including Italy, France and Austria; newly-devolved systems such as those in Eastern Europe, the Baltic States and Scandinavia and centralised systems such as China.

The development of most systems of external evaluation has been a result of an initial pragmatic response to government mandates and systems then adapt and respond to changing situations. However, within this fluid situation, some common themes emerge, which suggests a convergence to a dominant form of accountable autonomy (Harvey and Knight, 1996) (Figure 2). The systems that have traditionally espoused a market approach and those that have been influenced by the traditional British system of autonomous institutions supported by the state are finding their autonomy being eroded by government-backed requirements to demonstrate accountability and value for money (Bauer and Kogan, 1995). Where central control was, or continues to be, exerted over higher education, for example in China, Eastern Europe, South America and Scandinavia, there has been increasing delegated responsibility for quality but at the price of being required to be accountable and open to scrutiny.

Thus, in those countries where a new accountable autonomy is being granted, self-assessment is seen as indicative of the shift to self-governance. In those countries where universities have traditionally been autonomous, self-evaluation is seen as not only politically pragmatic but a necessary vehicle to ensure the institution focuses its attention on quality issues.

Since the mid-1990s the basic convergence to delegated accountability has been augmented by two other trends. First, is the tendency for second-phase evaluations to focus on or emphasise improvement. In a few cases, as discussed below, countries such as Sweden and Finland started with a clear improvement focus but the norm has been to

prioritise accountability in the first phase. The second augmentation to the delegated accountability model is the current preoccupation with accreditation. This is driven by a growing internationalisation agenda.

Figure 2: Delegated accountability
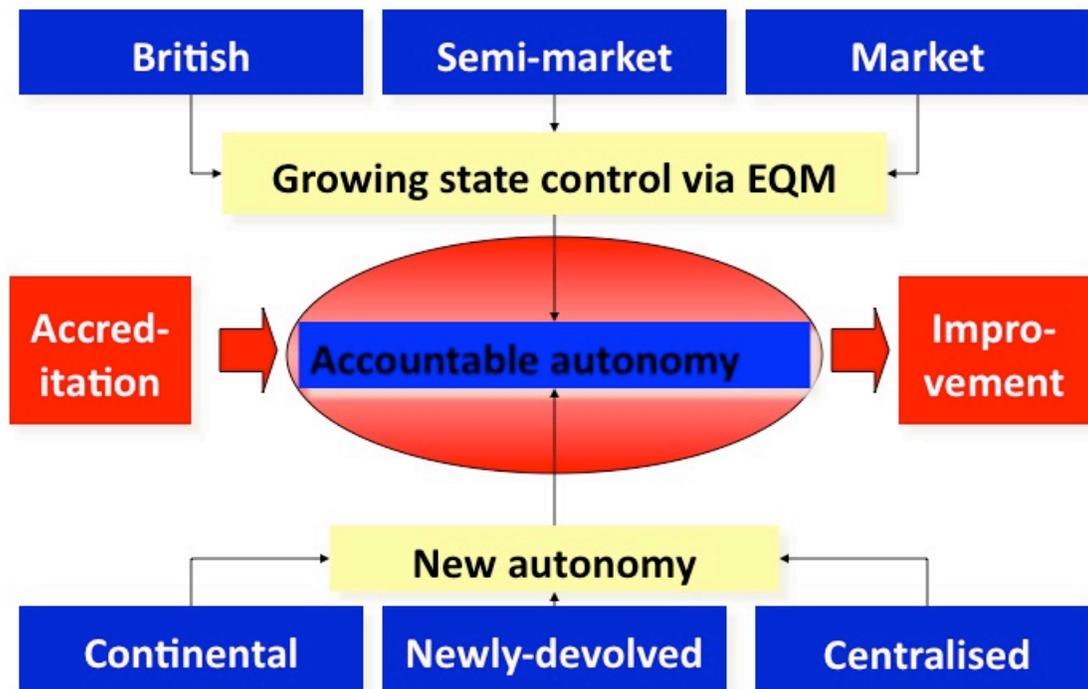
It seems, for example, that the Mjøs Commission in Norway intends the shift to delegated authority with the additional accreditation augmentation, initially making the higher education institution responsible for improvement. Haakstad (2001, p. 81), who characterises the 'increased focus on accreditation' as 'shift from quality enhancement to quality control' argues that the Mjøs Commission suggested:

> moving from a Ministry-regulated system of 'recognitions' to one where an independent agency is given all accrediting powers; from a situation where no systematic approach to accreditation control has been practiced to one where this is seen as a necessity; and possibly, from a system where formal concerns over accreditation will outweigh the developmental objectives of established evaluation procedures.

The Mjøs Commission also argues that evaluations should have an 'open and development-oriented approach' but the evaluations of the proposed 'evaluating and accrediting agency' should 'carry a system of accreditation controls on its back'. The

Commission's final statement about accreditation further complicates the issue as it is a warning against 'a major evaluation/accreditation bureaucracy' and the 'costs of a cyclical accreditation routine' (Haakstad, 2001, p 81). The problem is to maintain control while delegating responsibility without producing an unnecessarily complex, intrusive and burdensome approach.

Given the underlying shift from Ministry regulation to delegated accountability, what role, if any, does an evaluation agency have in increasing institutional autonomy? On the face of it, none at all, as the role of such as agency is to operate within the parameters established by law, decree or other policy specification. The agency might encourage changes to the legal framework or, if the agency has itself delegated powers, it may concede these to the institutions. However, this concession is rare in the early days of quality bureaucracies as they tend to be established in a climate of mistrust or, like any bureaucracy, are greedy to enhance rather than diminish their own power. The upshot, is that, unless such bureaucracies are dissolved by governments within a relatively short time frame or given very limited powers in the first place they become more entrenched and powerful and, often, more conservative and intrusive.

Purposes

The nature of external evaluation, and the extent of autonomy experienced by institutions, is dependent on the purpose of the evaluation. Most external agencies undertake evaluation for one or more of the following broad purposes:

- accreditation
- audit
- assessment
- standards monitoring
- accountability
- improvement

The first four can be seen as specific focuses for evaluation activity and the last two as constituting an underlying rationale for the evaluation, which suggests a four by two matrix (Figure 3).

Figure 3: Purposes for evaluation

Focus	*Rationale* *Accountability*	*Improvement*
Accreditation		
Audit		
Assessment		
Standards monitoring		

Broadly speaking, accreditation tends to be dominated by concerns about inputs, audit normally focuses on quality systems, assessment is usually perceived as concerned with

the educational process and standards monitoring usually addresses outcomes. Evaluation systems are often introduced to ensure higher education is accountable, often for the public money invested in it. Improvement tends to be seen as a secondary feature of evaluation, although some systems are designed with improvement as the primary function. These six 'purposes' will be explored in more detail below.

Accreditation

Accreditation is the establishment or revalidation of the status, legitimacy or appropriateness of an institution, programme (i.e. composite of modules) or module of study. It has been described as a public statement that a certain threshold of quality is passed (Campbell *et al*., 2000; Kristoffersen, Sursock, & Westerheijden, 1998). The formal public recognition embodied in accreditation is seen as being based on agreed, pre-defined standards or criteria (El-Khawas, 1998; Sursock, 2000). Accreditation, thus has two nuances: first, the 'abstract notion of a formal authorising power', enacted via official decisions about recognition and, second, the quality label that institutions or programmes may acquire through certain accreditation procedures' Haakstad (2001, p. 77).

Delegates at *The End Of Quality?* seminar identified three purposes of external evaluation[1], one of which was to ensure the integrity of higher education — including international integrity — through something akin to an accreditation procedure. 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. In the US, for example, institutional accreditation with established institutions is not providing much return on the monitoring process (Harvey, 2002).

Accreditation is thus of an institution or of a programme of study (Young & associates, 1983). Programme accreditation may be academic accreditation or professional accreditation, that is, accreditation of professional competence to practice. Accreditation is a binary state, either a programme or an institution is accredited, or it is not (Haakstad, 2001, p. 77).

At the institutional level, 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 revalidation, in Europe for example, is usually undertaken by national bodies either government departments or government-initiated agencies or quangos that make formal judgements on recognition. In the United States, accreditation is a self-regulatory process of recognition of institutional viability by non-governmental regional voluntary associations (Petersen, 1995). Institutional accreditation, especially initial recognition, tends to be more prominent in countries with a significant private higher education provision, such as

those in the Americas and Eastern Europe. For example, the Consejo Nacional de Univeridades in Venezuela evaluated and granted licences to new, experimental higher education institutions and continued to evaluate them until they attained full autonomy (Ayarza, 1993).

When examining subject or programme accreditation it is important to distinguish between validation, revalidation, accreditation and reaccreditation. Validation refers to the initial validation of new programmes (or modules) rather than whole subject areas. Validation is the 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 is an internal process. In others, new programmes require external approval, from an agency or government department. In others there are restrictions on new developments, for example, in Norway, where subject areas are already well-established at the 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 external but is often an internal process within permitted parameters and, usually, conforming to explicit guidelines.

Accreditation is the formal or official 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. Reaccreditation is, thus, the formal renewal of an accredited programme.

In the polytechnic sector in the UK, for example, the Council for National Academic Awards (CNAA) used to undertake validation (and periodic review) of all programmes of study under its auspices using peer visiting panels. CNAA 'approval' was equivalent to accreditation. More recently, 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). Eastern European countries such as Hungary, the Czech Republic and Slovakia opted, at least initially, for programme accreditation in all academic fields (Westerheijden, 2001). Accreditation (and reaccreditation) 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. 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 and Mason, 1995).

Accreditation tends to focus on inputs such as resources, curricula and staffing. Sometimes it addresses the teaching process but rarely explores outcomes such as the graduate abilities and employability. The exceptions are some of the professional programme accreditations undertaken in the UK or US (Harvey and Mason, 1995; Westerheijden, 2001).

In principal, 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 (see below) distinct from, but possibly contributing to, a formal process of accreditation of an institution. The same approach could, if the audit is subject focussed, also be used to validate or accredit programmes.

There are a wide variety of processes for internal and external validation and review and of formal accreditation and reaccreditation. In the UK for example, the evidence used by professional bodies is derived from one or more of the following: exchange of correspondence, scrutiny of documentation, special on-site visits or attendance at internal validation events (Harvey, 2001a, p. 224). In other settings, examination of statistical or performance indicators is used. For example, in Russia, following increased demand for higher education and widespread structural changes including the founding of non-state universities, accreditation is now based on comparative statistical assessment (INQAAHE, 2001c). In other settings accreditation might be based on evidence from audit and assessment processes described below.

Audit

Audit is the process of checking to ensure externally- or internally-specified practices and procedures are in place. Audits might establish the existence of such procedures or may attempt to audit their effectiveness. Audit might be of specific aspects of provision but is usually pitched at an institutional level.

Audit may be to ensure conformance with regulations or procedures specified by an external body, such as regulations relating to examination of students. It might be to ensure compliance to policy objectives or system-wide practices. For the majority of policy objectives, this is probably most effectively done at the institutional level. However, if policy is focused on specific issues such as encouraging problem-based learning, the development of employability skills, developing inclusive curricula, encouraging equal opportunities, then programme-level assessments are useful tools to see to what extent such initiatives have been taken on board.

Normally, audits check whether procedures are in place to assure quality or standards of higher education. This usually requires an institution to specify its internal quality-monitoring procedures, including identification of responsibilities and intra-institutional communication and co-ordination of practices. Such processes will usually be

circumscribed by established national or international protocols, codes of practice or tradition. Often an audit team (usually of peers) will receive documentation and visit the institution to establish the effectiveness of the stated processes via panel discussion augmented by informal conversations and observation. Audits do not usually attempt to evaluate the institution as such, just to ensure that the institution has clearly-defined internal quality monitoring procedures linked to effective action. This approach, which probably started in Britain (HEQC DQA, 1993) has been developed in New Zealand (NZUAAU, 1997) and Sweden (NAHE, 1996, 1997) among others (Dill 2000).

The current proposal in the UK is to 'strengthen' audit by enabling it to 'drill-down', that is, take a closer look at specific aspects of audit or particular areas where audit might suggest anomalies (QAA, 2002). This is very similar to 'drilling down' in financial auditing.

In some cases, audit is specifically targeted at improvement plans and processes, such as the quality audits of Finnish polytechnics undertaken by the Finnish Higher Education Evaluation Council (HEEC, 1997). In Sweden, the approach to audit undertaken by the National Agency was to focus on the stated improvement agendas of institutions and explore the efficacy of improvement projects and the approach appears to have aided the development of quality awareness and quality work in the institutions (Askling, 1997; 1998).

The largest US accreditor, the North Central Association of Colleges and Schools (NCA), proposes to implement a form of improvement audit. Fundamentally different from traditional quality assurance, which uses sporadic inspections to judge institutions against fixed standards, the new approach (AQIP) uses institutions' ongoing documentation of quality improvement to provide public quality assurance. It aims to help an institution incorporate quality improvement principles and strive toward self-chosen improvement targets to strengthen its competitive position (Spanghel, 2001).

In Australia, the short-lived external monitoring of the early 1990s undertaken by the Australian Committee for Quality Assurance in Higher Education (CQAHE) added a ranking to the examination of quality assurance portfolios volunteered by universities, which was linked to recommendations about additional incentive funding (Meade, 1993). The three rounds of the Australian approach focused on specific elements, such as teaching, research performance or community interaction.

The new Australian Universities Quality Agency (AUQA) will be undertaking audits of quality assurance arrangements and improvement plans in higher education and providing public reports. It will also audit the processes and procedures of state and territory accreditation authorities and of the impact of those processes on quality programmes. In addition, AUQA may use information from audits to 'comment from time to time' on the criteria for accreditation of new universities and non-university sector higher education courses. Furthermore, and unusually for an audit function, AUQA will be reporting on 'the relative standards of the Australian HE system and its QA processes, including their

international standing, as a result of information obtained during the audit process'. These reports will draw on

> AUQA's own national and international investigations, the institutions' and agencies' own international benchmarking and other comparisons, relevant quality procedures used by the institutions and agencies, such as ISO9000… and existing reports and surveys such as the Course Experience Questionnaire and Graduate Destination Survey. (INQAAHE, 2001b, p. 8)

The AUQA audit is also intending to 'pay attention to' research activities and outputs, communication with stakeholders and overseas operations. It remains to be seen whether audit can address all these angles or whether the AUQA rapidly finds itself adding layers of evaluation to achieve a burgeoning number of accountability and improvement purposes.

Assessment

Quality assessments set out to 'measure' the level of quality of inputs, processes and, sometimes, outputs. This may be a judgment of the overall quality of an institution or programme or of specified component elements. In France, for example, the Comité National d'Évaluation (CNE) evaluates each institution holistically (Staropoli, 1991; Ribier, 1995). [2]

Measurement may be against externally set criteria (both implicit and explicit), against internally specified objectives or missions, or a mutually agreed set of criteria. Many assessments are supposedly of fitness for purpose and thus institutions or programmes are assessed against mission-based criteria. In practice, there is a set of overarching expectations and the mission-based variability operates within narrow tolerances. Assessment might include a complex grading system or might be based on a simple satisfactory/non-satisfactory dichotomy.

Assessment may also 'benchmark'[3] against other institutions, national norms or against oneself over time. 'Benchmarks' are sometimes specified in 'contracts' such as student charters (for example in the UK). They tend to be quantifiable and restricted to measurable items, including the presence or absence of an element of service or a facility. Currently, benchmarking tends to be a voluntary activity engaged in by institutions, for example the Association of Commonwealth Universities/European Centre for Strategic Management of Universities University Management Benchmarking Programme (ACU/ESMU, 2001).

The focus of assessment are varied, often the purpose is to ensure that students receive comparable (or minimum national acceptable) 'service', both within and between institutions. 'Service', in this sense, includes quantity and quality of teaching, study facilities, learning support, pastoral support and equality of opportunity. The final version of the English assessments graded programmes on six specified dimensions (HEFCE, 1995). In the UK, subject teaching assessments have, unusually, involved subject assessors directly observing and evaluating teacher performance (HEFCE, 1994).

Sometimes assessments focus on, or include, participant or 'client' satisfaction with service provision (at institutional, programme or module level), in which case feedback from students, graduates or employers enhance the normal process of self-assessment, statistical indicators and peer review, as, for example, in the assessments made by the Danish Centre for Quality Assurance and Evaluation of Higher Education (Thune, 1993). [4] Measurement of 'customer' opinions (satisfaction) such as the Student Satisfaction Survey at UCE (Harvey, 2001b) and the Student Barometer at Lund University (ref) are used as annual indicators of service provision and inform management decision making.

There have been attempts to assess the value-added to students of their education (CNAA, 1990). Value-added refers to the enhancement of the knowledge, skills and abilities of students and the empowering of them as critical, reflective, life-long learners. Value-added is experiencing a revival of interest, as the result of considered discussions of published league tables at all levels of education, not least the burgeoning interest in measuring 'employability'. However, it is difficult to assess value added and most attempts have relied on measurement of entry and exit grades or abilities using somewhat crude indicators. Quantitative analysis of value-added is difficult for a variety of reasons including, the establishment of base benchmarks, measurement problems and the attribution of added value to the programme rather than some other factor. Arguably, though, the assessment of value-added is at the core of any improvement-oriented, value-for-money and transformative approach to quality assessment at the programme level.

Assessment has also focused on research, most notably on research outputs. Finland undertook such evaluations in the early 1980s (Luukkonen and Ståhle, 1990) and more recently Lithuania has evaluated research performance (Mockiene and Vengris, 1995). Probably the most extensive approach is the periodic Research Assessment Exercise undertaken in the United Kingdom, which not only provides a public rating of research for all higher education institutions across more than 60 subject areas but also allocates significant government funding to institutions on the basis of the rating — the higher the rating the more money is allocated (HEFCE/SHEFC/HEFCW, 1993).

Assessment thus may focus on inputs (such as teaching staff, learning resources) or process (such as teaching, learning, support services) or outcomes, (such as students academic standards of achievement or professional competence, employment rates, student perception of their learning). Assessment evidence includes statistical indicators, direct observation, direct evaluation of research outputs, student and graduate views, employer views, student performance, self-assessment and other documentation, discussion and interviews with teachers, students and managers, and perceptions of other agencies, such as professional bodies.

Standards monitoring

In systems that have made use of external examiners, external monitoring of standards predates external quality monitoring by many years. External examiners are, or have been, used to monitor standards on postgraduate or undergraduate degrees in the UK, Denmark, Ireland, New Zealand, Malaysia, Brunei, India, Malawi, Hong Kong and in the

technikons in South Africa (Silver, 1993; Warren Piper, 1994). In some professional areas, the external control on standards by regulatory or professional bodies has been a much more important factor than quality monitoring as the former is often linked to professional accreditation and the awarding of a licence to practice.

Standards monitoring has two main focuses: first, academic standards of a programme of study, identified by the academic work produced by students; second, standards of professional competence identified through the ability or potential to undertake professional practice.

Standards monitoring may specify standards that are appropriate or it may endeavour to ensure that standards are at appropriate levels, possibly by checking or even grading student work or performance. Standards monitoring may also attempt to ensure comparability of standards across the sector or across specific subject disciplines. External examiners inevitably make comparisons between programmes *within* subject disciplines, even if it is based on limited experience. Sometimes they grade directly but usually standards are inferred by scrutiny of a sample of work or by monitoring award statistics. Where there are, for example, externally-set and marked examinations, this can also be used to compare (or benchmark) standards. Some professional bodies in the UK set examinations linked to recognition of practice (Harvey and Mason, 1995) and the Provõa in Brazil is an example of subject-based national examination designed to monitor standards.

Comparability of standards may also be assessed indirectly by using (threshold) descriptors of outcomes as means of benchmarking standards. This approach is adopted by most professional bodies in the UK who specify minimum standards of competence for professional accreditation. More recently, QAA in the UK has attempted to produce 'benchmark descriptors' for many subject areas. Following protracted debates and readjustment of the complex external quality monitoring procedures in the United Kingdom during the 1990s (HEQC, 1995), there has been an attempt to establish explicit national 'threshold standards' for all undergraduate degrees on a subject-by-subject basis. This process is ongoing. The development of standards in three subject areas was piloted and subject benchmarks have been established for 22 subjects (QAA 2000c) [1]. These benchmark standards attempt to specify, in the form of outcome statements, the minimum knowledge and abilities that graduating students will possess. The use of these benchmarks is due to begin in January 2002 in England.

The specification of threshold minimum standards by the QAA reflects the approach of professional bodies. For example, the benchmark standards in law require that any student graduating in law must show minimum achievement in *all* the following seven

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[1] The subject areas are: Accounting, Archaeology, Architecture, General Business and Management, Chemistry, Classics and Ancient History, Computing, Earth Science, Environmental Sciences and Environmental Studies, Economics, Education Studies, Engineering; Geography, History, Hospitality, Leisure, Sport and Tourism, Law, Librarianship and Information Management, Philosophy, Politics and International Relations , Social Policy and Administration and Social Work, Sociology, Theology and Religious Studies.

areas of performance: knowledge, autonomy and ability to learn, communication and literacy, numeracy, information technology and teamwork (QAA, 2000a). The benchmark statements are expanded and the law benchmark descriptors run to 30 pages. Not only is there considerable variation in specificity *within* the law benchmarks there is enormous variation *between* different subject areas (Harvey, 2001a). For example, sociology, unlike law, focuses on key concepts and theoretical approaches, awareness of social context, the value of comparative analysis and the need to develop understanding of the relationship between individuals, groups and social institutions, the role of culture in social life, the social processes underpinning social change, the nature and appropriate use of diverse research strategies and methods in gaining sociological knowledge, the relationship between sociological argument and evidence and an awareness of the distinctive character of sociology (QAA, 2000b). However, despite the extensive and detailed work only very general descriptors have resulted, which are open to varied interpretation and that do not in any way guarantee comparability. Indeed, the benchmark proficiency descriptors are so subjective they do not go beyond the implicit 'gold standard' hitherto used by external examiners. Indeed, the potential effectiveness of these standards continues to rely on the UK external examiner system and, in some discipline areas, the associated professional bodies. The descriptors themselves are more akin to a specified 'national curriculum' than any base benchmarks for comparability of outcome standards.

There is a growing international interest in standards monitoring, not least in professional areas, where there is a concern to ensure that standards of professional competence are internationally comparable (see below). In the main, comparability of international standards is evaluated indirectly rather than directly. At a programme level, international experts may be asked to comment on the content and assessment of modules when the programme is being devised, or in some cases, international external examiners may be used. Mostly, though, the best that can be achieved is to encourage those who run the programme to explore the extent to which the outcomes of their programme reflect international standards, through voluntary benchmarking, as AUQA will be doing in Australia. At a subject or institutional level, though, there are moves to implicitly compare standards via international accreditation or through mutual recognition of assurance processes (see below).

A further purpose of standards monitoring is to enable the development of national and international systems of credit accumulation and transfer. Credit accumulation and transfer (CAT) has been in place in some countries for many years and is designed to ensure flexibility and responsiveness to student requirements and increased mobility. However, few students really take advantage of CAT schemes beyond the crediting of a single term or semester of study as an 'exchange' student with a recognised partner institution or via a formal programme, such as ERASMUS in the EU. Furthermore, many CAT schemes function better in theory than they do when put to practical test and some students can find themselves disadvantaged when using them as they find that aspects of their study are not acknowledged.

Accountability

Accountability has been the dominant underlying rationale for introducing quality evaluation and the main starting point for government's imposition of quality monitoring on higher education. In countries with considerable traditional or market-based autonomy accountability has been increasingly imposed on higher education. In others, previously more controlled, accountability is the price for more autonomy. The reasons for accountability include the cost and potential problems of massification, the concomitant need to account for increasing amounts of public money, the need to ensure value for both private and public monies, lack of clear lines of accountability within higher education systems, globalisation and the need to keep control of a increasingly unrestricted market.

External evaluations are often set up, initially, to ensure that the institution or programme is accountable to appropriate stakeholders such as the government (on behalf of tax payer), professions, employers and students. Often there is a clear concern to ensure that public money is spent appropriately — in short, to ensure value for money of teaching and learning, research, resources and management. Assessment exercises of teacher performance and research outcomes, for example, along with statistical data on student progression and achievement and graduate employment have *inter alia* been used as accountability measures, or 'performance indicators'.

A second accountability function is to ensure that that principles and practices within higher education are not being eroded or flouted. This form of accountability is mainly used to control the development of private providers but can be used to ensure that public providers do not become lax. Accreditation, audit, assessment and standards monitoring all have a role to play here.

Third, is accountability to students that the programme is organised and run properly and that and appropriate educational experience is both promised and delivered: increasingly, in some countries, that they are getting value for the money they are personally investing. This overlaps with assessments that attempt to monitor the nature and quality of service.

A fourth accountability purpose of quality evaluation procedures is the generation of public information about the quality of institutions and programmes. This is both information for funders, which can be used, for example, to aid funding allocation decisions and information for users (such as prospective students and graduate recruiters) that helps inform choice.

Surveys and anecdotal evidence suggest that relatively little use is made by students or employers of information that results from external monitoring processes. Dutch secondary school pupils appear to have little interest in evaluation data that show differences between higher education programmes (van Walsum, 2000). Some information is not easily accessible and students often only see the information that the institution chooses to put in its prospectus or on its web sites. However, the main reasons why the evaluation information is less used than it might be is because it is too general and insufficiently oriented towards the potential user. There is a tendency to produce

information at the level of the higher education institution although, for most students, the key information is that which obtains at the discipline or programme level. However, information needs to be presented in an appropriate manner, which requires clarification of what models underlay the information provision. For example, there is a tendency to assume a consumerist model of learning and hence implicit comparison of what students can expect and force them to choose from 'the best'. A participatory model of learning would requires information that enables students to identify what is best for them or for their learning style.

Increasingly, it is the intention of most monitoring agencies to provide or ensure institutions provide stakeholder-friendly information that may aid choice (of programme for prospective students and of graduates for employers). However, there is an ongoing tension between the information needed by students and employers and that necessary for government, higher education institutions and teachers within universities and colleges.

There is a growing tendency for evaluation outcomes to appear as league tables, whether officially sanctioned or constructed unofficially from published reports and statistics. The vast majority of these league tables are error-filled, decontextualised and are counter-informative. If league tables are to be used then it is important that they are *discipline-based* and not institutionally-based as there are vast variations within institutions and the mix of disciplines will greatly affect the 'ranking' of an institution.

Discipline-based league tables, designed for information purposes, should be multi-dimensional rather than based on a composite index of dubious construction — that is, it should not be based on arbitrary weighting of convenience measures, as for example in the *Sunday Times* ratings in the UK. Ranking tables should provide students with an array of different information to allow them to identify the best programme for their purposes. This may mean the use of qualitative data as well as numeric rankings. The *Which?* report consumer tables, and accompanying commentary, offer a model of an approach to league tables that would be appropriate and useful at a discipline level.

In the UK there is also a growing demand for the publication of the views of current students, at programme level, to inform prospective students and other stakeholders. In reviewing information requirements, HEFCE set up a committee chaired by Ron Cooke that proposed that student satisfaction with the service they receive should become a key public information source. The Committee acknowledges that current students can provide a clear perception of the strengths and weaknesses of study programmes (Harvey, 2001c).

Delegates at *The End of Quality?* seminar considered that the third[5] purpose of quality evaluation should be to provide information to various stakeholders, including prospective students, employers and funders. Indeed, this information provision was the preferred form of any accountability role required of agencies (which some delegates considered inevitable). However, it was suggested that information provided by quality monitoring bureaucracies should be 'qualitative' and informative rather than summative, quantitative evaluations of dubious statistical validity. It was argued, though, that quality

monitoring is not necessarily the best way to provide the appropriate information. Research may provide much better analysis and more reliable information more cost effectively (Harvey, 2002).

A fifth, accountability purpose is to use quality evaluation as a vehicle to achieve compliance. Evaluation encourages compliance to (emerging or existing) government policy or to the preferences or policy of stakeholders such as professional bodies and employer lobbies. Government is usually the most important and powerful of these for higher education because it supplies so much of the money and in many cases controls the licensing of institutions. Governments around the world are looking for higher education to be more responsive. This includes responding to value-for-money imperatives, making higher education more relevant to social and economic needs, widening access to higher education and expanding numbers, usually in the face of decreasing unit cost. In addition there is pressure to ensure comparability of provision and procedures, within and between institutions, including international comparisons.

At the simplest level, quality evaluation has encouraged, or even forced, compliance in the production of information, be it statistical data, prospectuses, or course documents. Such compliance means that taken-for-granted practices and procedures have had to be confronted and clearly documented. 'It represents the minimum required shift from an entirely producer-oriented approach to higher education to one that acknowledges the rights of other stakeholders to minimum information and a degree of 'service'' (Harvey, 1998b).

Quality evaluation is also a tool that can be used to ensure compliance at the local level, that is, within an institution. For example, quality assurance can be used to unify disparate institutions behind a common goal or framework. In the new polytechnic sector in Finland, some Rektors used the Finnish Higher Education Evaluation Council's (FINHEEC) pilot quality audits as a way to focus the attention of very diverse component institutions onto the new polytechnic mission and procedures.

Quality evaluation is also linked to overt political agendas as well as to less overt ones, such as attempts to reduce the autonomy of academia and questioning the extent to which mass higher education is producing 'work-ready' graduates. Rather more controversially, quality evaluation has been accused of creating a smoke screen to ensure compliance to resource restrictions by covering the issues that arise when student numbers increase rapidly without a commensurate increase in staffing and resources. Indeed, a quality-management system can be viewed 'from a Foucauldian perspective as a method of controlling'. Control of academia is not via direct intervention, rather the state and the institutional management 'maintain a degree of surveillance from a distance that ensures that the requirements of the system are met' (Barrow, 1999, p. 35).

Improvement

External quality monitoring is also usually expected to lead to improvement: at the very least more transparent documentation. Monitoring might be specifically designed to

encourage continuous improvement of the learning and teaching process. In some cases, such as the Swedish audits, it was designed to evaluate the quality improvement process by identifying improvement projects and evaluating their effectiveness. In any event, external monitoring is usually expected to result in better dissemination of (good) practice.

There has been a long-running debate about the effectiveness of accountability-oriented approaches in securing improvement. That many systems of monitoring quality specifically emphasise improvement at the second stage of development of the monitoring process tends to suggest that improvement does not necessarily go hand-in-hand with accountability. Initially, in the UK, the Higher Education Quality Council (HEQC) had separate branches for 'audit' and for 'enhancement', which acknowledged the separation of accountability and improvement. The enhancement function faded away and when the HEQC was absorbed into the QAA it disappeared altogether.

Delegates at *The End of Quality?* seminar maintained that the primary purpose of quality monitoring bureaucracies should be to act as catalysts for internal improvement within institutions. This role requires dialogue and advice as part of the monitoring procedure and the renewal of a trusting relationship between external body and institutions. The emphasis on dialogue and support in EQM processes in Sweden was, for example, compared favourably to the British process. The use of performance indicators was not seen as helpful in this respect, on the contrary, performance indicators encourage manipulation of data by institutions to meet targets. There was a preference for 'continuous improvement' and process-driven quality improvements. Such processes will, it was argued, generate their own performance indicators, which will be owned by institutions and will measure real improvement (Harvey, 2002).

Internationalisation

The rapidly growing interest in international quality evaluation has come about because of the globalisation of higher education and the perceived need for international comparability, compatibility and transferability of qualifications thus enabling international student mobility. Rather more defensively, international evaluation is seen as a potential safeguard against the activities of new providers and various forms of 'borderless' higher education in an era of liberalisation of 'trade' in higher education. Given concerns about private and transnational higher education providers, the United Nations Educational, Scientific and Cultural Organization's (UNESCO) Global Forum on Quality Assurance and Accreditation in Higher Education will maintain a 'watching brief' on their activities as, according to Sir John Daniel the group's assistant director for education 'national governments can no longer be the sole determinants of the public good' (Jen, 2001).

As the number and type of institutions of higher education around the world expands, the need for students, institutions, employers, governments and others for reliable information about the quality of institutions and programmes in higher education

worldwide becomes increasingly important (IAUP, 2001). In the US, the Council for Higher Education Accreditation (CHEA) is 'initiating a CHEA "first" — a one-day seminar on international accreditation and quality assurance' (Eaton, 2001).

There are various possible ways that international accreditation could occur. One approach is for *mutual recognition* between national agencies, which was at the root of developments on the back of the 1998 UNESCO World Conference on Higher Education and the 1999 Bologna Declaration in Europe. Article 11 of the Declaration states that quality is a multi-dimensional concept and must include specific institutional, national and regional conditions. Individual nations' approach to quality assurance must be respected and that any European dimension in accreditation arrangements must rest on national systems. Nonetheless, it seems that current discussions relating to mutual recognition are less about mutual trust of other national accreditors as about establishing internationally recognised criteria with an implicit convergence agenda.

Second, *international* agencies could be established doing much the same that national agencies do, that is, organisations that lie outside national systems and would directly accredit or assure institutions or, more likely, programmes. These organisations might be based on international communities such as MERCOSUL or the European Union or be private organisations or consortia with an international reach, membership or credibility. Organisations such as European Quality Improvement System (EQUIS), ABET and the European Consortium of Public Administration programmes (EAPAA) offer or are intending to offer a form of voluntary international accreditation of institutions, faculties and programmes (often for international professional recognition) according to certain threshold levels. The criteria are defined by the accrediting agency or consortia. However, such accreditation may have more in common with membership of a club and thus enhance an institution's reputation, than it does to provide any international assurance of quality.

UNESCO has indicated plans to set up an international quality assurance body that might draw on a range of partners including national accrediting bodies and intergovernmental partners such as the World Trade Organization, the World Bank, the European Commission. The intention would be to set up a general code of conduct for institutes of higher learning, both public and private. However, UNESCO had no intention of this body acting as an accrediting agency, although it would like to see a growth in the number of internationally recognised degrees (Jen, 2001).

The logistics of peer review and language and cultural compatibility would be more complex for international than national organisations. There are also language and cultural problems when using international peers. There are considerable differences in the extent to which different discipline areas consider international peer-review to be objective and reliable. Some recent research suggested that physicist considered international peer-review as an objective and reliable method of quality assessment, whereas sociologists thought this not feasible (Kekale, & Lehikoinen, 2000). Where international agencies have worked successfully, such as CRE audits, the institutions have taken part voluntarily and the process has had a clear improvement rather than

accountability function. Any potential European-wide accreditation agency, is, for example, something considered likely to be overly bureaucratic, too closely specified and costly and thus unwelcome (Harvey, 2002). Although there has been 'opinion in favour of more binding arrangements inside the European Union, there are no official hints at an all-European accreditation régime' (Haakstad, 2001, p. 79).

A third approach would be to create *supranational* agencies. The European Network of Quality Assurance Agencies might, for example, undertake evaluations of the practices and process of national agencies with a view to providing some type of European accreditation of national agencies. It has been argued that the international credibility of the quality processes in most European countries is not very high and would be enhanced or better understood internationally if 'kite-marked' by a supranational European agency (Campbell & van der Wende, 2000).

What exactly will be accredited by any supranational evaluation is unclear but there seems a strong likelihood that it will increase pressure on member countries to develop broadly similar practices to qualify for a 'quality label'. Indeed Sursock (2000) has argued that a European supranational 'accreditation system' ought to 'allow convergence while respecting national diversity; preserve diversity of higher education institutions and programmes; [maintain] appropriate balance between institutional autonomy and legitimate accountability demands; be flexible to adapt to continuous international volatility; add value to current quality assurance systems' (quoted in Westerheijden, 2001, p. 71).

The notion of a quality label lies beneath the current discussions between the International Association of University Presidents (IAUP), the International Network of Quality Assurance Agencies in Higher Education (INQAAHE) and UNESCO. IAUP has grown increasingly bullish in its interest in international quality assurance. Since its meeting on 15 February 2000 in Bangkok, the Commission on Global Accreditation of IAUP (established in July 1999) has shifted ground. It initially encouraged 'mutual recognition' and assisting members to 'establish groups of institutions which can help accredit each other's educational programmes based on quality assurance and with defining accreditation standards' (Van Damme, 2000, p.1). Its current position (December 2001) is to propose a supranational quality assurance agency.

The Commission on Global Accreditation proposed a worldwide quality label for quality assurance and accreditation agencies (IAUP, 2001). A consortium based on IAUP, INQAAHE and UNESCO would operate the label. The intention is that the public, all over the world, would be assured that the local quality assurance agency that reviewed the institution or programme is reputable and thorough. In practice this would mean the agency meets standards for trustworthy quality assurance, such as a clear commitment to develop academic quality in the institutions and programmes evaluated by it, fair and appropriate quality assessment procedures, and well-developed and publicly-available protocols or manuals that describe, in a transparent way, the procedures and standards used in quality assessment processes.

The system, it is argued, is intended to promote mutual recognition of quality assurance agencies in different countries. The process also aims to advance mobility of students, academics and graduates as well as aid credit-transfer and the recognition of qualifications, support co-operation between programmes and joint development of curricula. Ultimately the proposed system is intended to enhance the quality of higher education institutions and programmes worldwide stimulating providers to 'strive for the highest academic quality' (IAUP, 2001). The initial eligibility and evaluation criteria for the world quality label, outlined below, have, though, caused some concern amongst members of INQAAHE. [6] Basic characteristics of eligibility are:

- 'Activities of the agency concern external quality assurance or accreditation…..
- The quality assurance or accreditation agency addresses primarily the educational function of HE institutions.
- Activities of the agency can be defined as quality evaluation, review, audit, assessment or accreditation….
- Those activities are executed on a regular basis and in a systematic way.
- The range of institutions evaluated or accredited by the agency can be public and private, national and transnational, confined to one discipline or covering many disciplines.
- There is evidence of reliance on the agency by the academic community (including students), by employers, by government, or by others.
- The agency must have a minimum of two years' experience in the field of external quality assurance or accreditation in order to obtain the world quality label….' (IAUP, 2001)

It is not the intention of the quality label 'to impose a specific methodological approach or specific quality standards' but the proposal goes on to say that 'external assessment by the agency should be based on a combination of self-evaluation and peer review'. [7] The views of international delegates at *The End of Quality?* seminar in Birmingham (Harvey, 2002) cast doubt on the efficacy and acceptability of this dominant methodology. The dominant approach of self-assessment (supported by statistical indicators), peer review and publication has been critiqued elsewhere, not least because of the performance, game-playing and 'double bookkeeping'[8] that accompany the methodology (Barrow, 1999; Harvey, 1998a; 2002). [9] Furthermore, the convergence that appears to lie behind such proposals leads to cultural blindness perhaps reflecting the imperialistic nature of quality evaluation (Lemaitre, 2001).

The current obsession with international accreditation is losing sight of the quality assurance process. It is also ascribing far too much to the accreditation process. Accreditation is about formal recognition and a variety of activities are used, more often than not heavily oriented towards inputs. Accreditation, though, is not distinct from quality assurance processes. No reputable agency accredits an institution or programme unless it is convinced that the institution is able to *continue* to deliver the criteria used in achieving the accreditation. Where accreditation requires evidence beyond essentially paper-based applications for example, where sophisticated explorations of quality systems or evaluations of the learning process or standards of outcomes are undertaken by inspectors, visiting panels or peer groups then there is clear cross-over into the realms

of audit, assessment and standards monitoring. To some extent, then, accreditation is being misleadingly used as a catch-all term. This is partly born out of the sudden re-emergence of the view that US-style accreditation as somehow an appropriate model for other parts of the world. There is a misleading mythologizing of the American system of accreditation as a viable means for ensuring mutual recognition of quality. This notion is resisted, particularly in parts of Europe that also see it trailing 'unwelcome' American culture behind it. More considered reaction suggests that the US system has many deficiencies[10] and, ironically, the resurgence of interest in US accreditation comes at a time when some agencies in the US are exploring alternative 'reaccreditation' procedures, akin to audit, that are more worthwhile for well-established participant institutions (Spanghel, 2001).

Furthermore, one has to ask whether there is a growing tendency to unnecessarily initially accredit or reaccredit programmes and is this indicative of a problem of trust and overcontrol of the sector. This concern becomes particularly acute in the wake of the Bologna Declaration where the new bachelors-masters structure is being developed. Instead of allowing institutions autonomy to rigorously internally validate these new programmes (perhaps using external advisors to ensure comparability) and then formally accrediting them for funding purposes subject to the existing national quality assurance processes, governments are maintaining control by requiring formal accreditation of these restructured programmes outside the existing assurance processes. In short, internationalisation is having an affect on national procedures. The situation in Germany and the Netherlands provide examples.

Recent changes in Germany, following the Sorbonne Declaration of 1998, has enabled the introduction of bachelor's and master's programmes as an alternative to traditional German qualifications. Agencies that wish to undertake initial accreditation of such programmes can be set up freely but need to be recognised by newly-established federal Accreditation Council (Akkreditierungsrat, 1999; Berner & Richter, 2001). The criteria for the agencies include being independent, not-for-profit, and to cover more than one higher education institution and more than one type of programme. They should have national and international expertise and criteria and standards should reflect the agency's competence. The Accreditation Council also sets reporting requirements.

In the Netherlands, the introduction of bachelors' and masters' is also being linked to a national accreditation organisation that is likely to 'kite-mark' a range of potential evaluation agencies. The big difference with Germany is that the Netherlands has more than a decade of well-established national quality assurance processes, while Germany has little in the way of federal or Lande-based quality assurance agencies. Linking accreditation to established quality assurance is problematic in a period of structural upheaval (this is discussed further below). Although the Bologna Declaration does not mention how transparency is to be achieved, Westerheijden (2001, p. 68) argues that many Western European countries, the Netherlands included, have interpreted this as introducing programme accreditation instead of, or on top of, existing external quality assurance arrangements. 'In policy developments in Western Europe, the *communis*

opinio seems to be that the new bachelor's and master's degrees need to be safeguarded through programme accreditation'.

Bureaucracy, legitimacy and burden

It does not seem to matter which approach or approaches to external quality evaluation are taken, academic and institutional managers complain about the bureaucracy, the legitimacy and the burden of external processes. Delegates at *The End of Quality?* seminar, from countries with existing systems, agreed that monitoring processes, however benign, imposed an unnecessary burden and that any form of external quality monitoring would involve some level of 'bureaucracy' (Harvey, 2002).

Bureaucracy

Bureaucracy refers to both the organisation of the external monitoring process and the process by which such monitoring takes place. The key issue is not so much the existence of a bureaucracy or of bureaucratic processes but the *nature* of the bureaucracy and its processes. By this, delegates were not concerned so much by the regulatory or statutory power, auspices or independence of quality evaluation bureaucracies, rather they were concerned that whatever the bureaucracy's characteristics it should, primarily, serve the stakeholders in higher education. It was proposed that quality monitoring bureaucracies should be flexible and enabling rather than controlling. Higher education institutions have changed and evaluation bodies should also be prepared to adapt and be flexible.

The problem is that the bureaucracies become established and politicians are afraid of losing face if agencies are dissolved as this would appear to constitute an admission of failure. External quality evaluation risks becoming 'standardised', which may lead to excessive bureaucratisation and inflexibility. Without periodic change, delegates argued, 'there is the danger of ending up with a British-style, QAA-type, system: a rolling 'juggernaut', that is not sure what it is looking for, but which ensures compliance and minimises innovation and risk-taking' (Harvey 2002).

As noted above, there is a tendency for quality bureaucracies to grow to take on more activities and this is, for example, a particular concern in those European countries shifting to a bachelor-masters structure. If the new agency in Norway, for example, is both an auditing agency (accrediting institutions on the basis of a review of quality processes in place) and is intended to directly accredit all the new graduate studies that are developed in the Norwegian system, then it will have a significant and rising workload. If the aim is to have a small but potent bureaucracy then it might be better expending energy planning required masters provision and delegate authority to put them in place, by providing clear guidelines, which for example, might invite institutions to ensure they include overseas external advisers in the framing of new masters' programmes.

Legitimacy

Similarly, the legitimacy of external quality evaluation is important and that tends to depend on the extent it is supported by academics, which itself is a function of how collaborative the process is. Where the evaluation is seen as something being 'done to' an institution or department there is a legitimation crisis. Legitimacy is less of an issue where there is dialogue and engagement with a view to making use of the process to help institutions, departments and individuals develop and improve their outputs (Outputs include enabling student learning, knowledge through research or community involvement.) Interactive debriefing — not just summary reports — as, for example, in the New Zealand system is likely to increase legitimacy

It was noted by delegates *to The End of Quality?* that universities have very different attitudes to funding of research linked to external assessment compared with funding linked to evaluation of teaching. Research assessment is often perceived as somehow more legitimate. One explanation might be the greater the degree of difficulty (real or perceived) associated with measurement of teaching. However, many delegates were of the view that evaluation of teaching is a critically important objective of quality monitoring. Whether this is best achieved through internal processes, peer visits or professional inspection was a moot point.

In the end, to be legitimate, the purpose and goals of any external (or internal-external) monitoring need to be clear, Furthermore, external agencies should not adopt a policing role. Rather external processes should be supportive, aiding improvement in institutions and the system as a whole. In addition, external evaluation should not displace legitimate internal-external processes such as external examining and departmental reviews, which tend to have credibility (Harvey, 2002).

Burden

External monitoring is burdensome: but some approaches are clearly more burdensome than others. The more controlling and intrusive the evaluation, the more objectives an evaluation has, or the more evidence that is needed the greater the burden it is likely to impose on the sector. Thus any evaluation that attempts to assess fairly will tend to be comprehensive, exhaustive and thus burdensome. In the UK, the combined system of subject review, institutional quality audit, research assessment, professional accreditation and external examining, supported by a standards infrastructure consisting of codes of practice, subject benchmarks, programme specifications, qualifications framework and student profiles is very burdensome indeed. This apparently exhaustive package is a heavy price to pay (for the government and for the institutions) for the tracing of a tiny number of sub-standard programmes, whose shortcomings might possibly be found out through simpler control procedures (Underwood, 1998).

Psychologically, if the evaluation is not trusted, is not considered as helpful, runs contrary to the academic culture or carries with it financial or reputational consequences it will generally be perceived to be more burdensome than perhaps it is. When one is forced into doing a job one considers irrelevant, unnecessary, unacceptable or unpalatable

then it will be perceived as a chore. More importantly, those involved will not engage with the process and it is likely to be counterproductive at worst or result in short-term compliance at best.

At the *End of Quality?* seminar concern was expressed by those countries with newly developing systems, such as South Africa and Australia, that the past experience of other countries indicates that institutions and academics would be faced by a heavy burden of extra work. It was also suggested that, in some small countries, the process is excessive. For example, Denmark is a small homogenous society and higher education does not need heavy accountability machinery.

Delegates also thought that the main burden, was the time taken in preparing for monitoring events, in particular, the requirement to prepare specific event-related documentation. 'Rather than ask for specific documents, agencies should evaluate on the basis of what institutions already produce. If the evaluation, for example, reveals that the institution does not provide adequate material to students about assessment criteria, then this should be noted for future action.' (Harvey, 2002). Preparing for events was criticised because it diverted scarce resources from the key tasks of higher education: viz., the improvement of the learning and experience for students and the development of research and scholarship.

However, the new emphasis on accreditation, linked to restructuring, might lead to over burdensome and cumbersome processes as 'accreditation' is tacked onto other quality processes such as audit.

> Will accreditation systems be inflated so as to invade and dominate the domain of evaluations and cause these to refer more to fixed standards? … a case in point… is the recent development in Sweden, where a programme of comprehensive, cyclical subject reviews is now being introduced, with accreditation control as one of its explicit aims. Will more comprehensive systems of accreditation control really assure and enhance educational quality, and if so, at what cost? (Haakstad, 2001)

Impact of evaluation

External quality monitoring of higher education has been in existence for over a decade and the number of countries undertaking it continues to grow. Members of INQAAHE come from over 70 countries. There is a lot of experience but relatively little evaluation of the evaluators. Evaluation of evaluators appears to be a rather *ad hoc* process. Unlike the published reports of the evaluators, research reports that evaluate evaluators are much less easy to locate. In an analysis for the INQAAHE Conference (Harvey, 1999), I suggested that there are three types of evaluation of evaluation systems. Type 1, opinionated or 'theoretical' analyses that tend to 'predict' the likely affects of the introduction of, or change in, evaluation systems (Wilson, 1996). Type 2 analyses are based on, often limited available evidence, much of it anecdotal: for example, the benefits

attributed to self-evaluation is based on accumulations of such anecdotal evidence (Harvey, 1998a). Type 3 analyses are based on systematic data collection.

The following review of impact draws on opinion, anecdote and some Type-3 studies[11]. At *The End of Quality?* seminar there was considerable doubt expressed about the efficiency of most external quality evaluation.

> Apart from the excessive cost to the exchequer of external systems, the internal costs of monitoring, in some countries, are enormous and in no way reflect the value gained from the process. Not only does external quality monitoring fail, in many systems, to engage with the internal improvement, its periodic and dramaturgical manifestations do not readily help inform change management in institutions. (Harvey, 2002)

Furthermore, some delegates thought that external evaluations actually inhibit innovation because of the application of conservative or rigid evaluation criteria. Impact leads to uniformity: Westerheijden (2001, p. 70), for example, argues that national accreditation arrangements work towards national uniformity rather than diversity.

> any single accreditation procedure checks conformity with a single set of criteria, usually defined in terms of inputs and curriculum. Accordingly, all programmes (in a certain field of knowledge) within the country tend to conform to this set of criteria, that is, they tend to converge. In a number of cases, such equality is a consequence of intended equivalence, intended to ensure that degrees have the same meaning all over the country.

In this respect, and others, quality processes were seen by *The End of Quality?* delegates as a vehicle for the introduction and implementation of government policy.

More damaging than lack of innovation and conformity, was the view that most external evaluation led to only temporary adjustments rather than lasting improvement. There is considerable anecdotal evidence that the initial impact fades away quickly, especially if there is no significant connection between internal and external processes. External monitoring must interact with internal quality systems: the real benefits, it was argued, are products of the external-internal dialogue.

Thus, the issue was how to embed changes that may result from quality monitoring processes. Such embedding, it was generally acknowledged, involved changes in culture and these do not occur quickly. Nor do they occur if the participants (students, staff, institutional leaders) are not committed to them. It was noted that there is a 'paranoia shift' amongst staff in higher education institutions: from a fear of who will be targeted by evaluation processes to cynicism that nothing will happen anyway.

Delegates suggested that if quality monitoring is seen as an 'event' rather than a 'process' there is little likelihood of the event making much long-term impact. Rather, it is likely to lead to performance and game playing. The more the process is one of complying with

external requirements the less the lasting internal benefits. This whole process is exacerbated by links to funding, which drives institutions to conceal weaknesses rather than engage in self-evaluation and improvement.

Perhaps the severest criticism raised by delegates was that external evaluations had no impact on programme quality or student learning (Harvey, 2002). There is no evidence of clear impact on learning and, indeed, available research suggests that other factors entirely outweigh the impact of external quality monitoring on student learning (Horsburgh, 1998). The structure and organisation of external quality monitoring is not compatible with empowering staff and students to enhance the learning situation.

Horsburgh's (1998) longitudinal study of the role and importance of external processes is a rare study that address the impact on the student experience, specifically changes to the transformative learning experiences of students. Horsburgh starts by identifying the elements needed for transformation and constructs a framework that structures her observations, interviews and wide-ranging document reviews rather than start from the external processes and explore whether changes recommended have been put in place, Eight key factors are shown to have a significant impact on change management on the two degree programmes she analysed in depth. These are:
- the curriculum intent and philosophy, along with the programme-development team who determine what this will be;
- leadership;
- members of external approval panels, external monitors of programmes and a professional body;
- the teaching staff and how they teach and assess students;
- the teaching staff and the environment in which they teach;
- programme-specific internal quality monitoring, both formal and informal;
- resource issues;
- student expectations.

Horsburgh mapped the dialectical interrelationship between the factors that impact on degree programmes and the student experience of learning (Figure 4). This is not in any way intended as a causal model but as a map of the complexity of the processes and as indicative of the wider context and state of flux in higher education. She suggests that there are far more important factors impacting on innovation in learning than external quality monitoring.

Horsburgh (1999, p. 23) concludes that, overall, 'the greatest impact on student learning was the curriculum, factors that influence the curriculum, and the teachers. The most direct impact on student learning was from teacher practices, how they help students learn and the assessment practices they employed'. On the other hand, in an institution that has comprehensive quality systems in place, which have been influenced by external requirements, 'there was minimal impact of quality monitoring activities on actual learning and teaching practices'.

The factors impacting on the student experience of learning confirmed what many higher education commentators report, that for quality monitoring to have an impact on the effectiveness of higher education, the emphasis must be on the curriculum, learning and teaching. Quality monitoring must focus on more than systems, inputs and outputs, if effectiveness is to be enhanced. (Horsburgh, 1999, p. 23).

Figure 4: Factors impacting on the student experience of learning
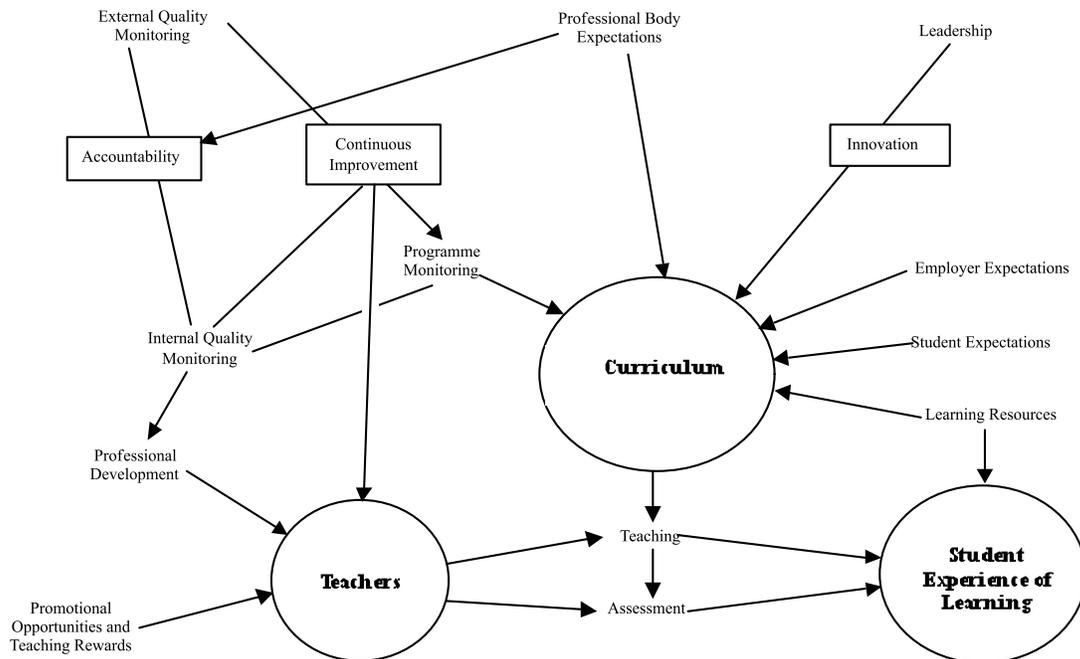
Source: Horsburgh, 1999, p. 22

Baldwin's (1997) evaluation of the impact of the short-lived Australian evaluations on Monash university suggests that it focused attention on teaching and learning. The result has been an intensification of debate about effective learning and the use of student perspectives in the shaping of programmes of study. She suggests that, coincident to the development of external quality monitoring, there has been an improvement in the quality of attention given to teaching and learning at Monash. However, this may be as much to do with the impact of new technology as to external quality monitoring. Furthermore, some of her colleagues, she reports, are far from convinced that external quality monitoring represents an overall gain rather than loss as the costs of the process include excessive bureaucratisation, greatly increased administrative workload, a formalism that can stifle creativity and individuality and an implicit lack of trust in academic staff.

Delegates at *The End of Quality?* were of the view that the nature and impact of quality monitoring may be different depending on whether the higher education system and quality assurance are at an early stage of development or well-established. There was a

general feeling that, over time, external monitoring should become less frequent, less intrusive, give more trust to institutions and work more collaboratively. It was suggested that emphasis should be placed on interim internal monitoring, reports of which should go to the external agencies. There is a need for constant reflection and change in the procedures, the purposes and in the agencies themselves.

Published studies also suggest that evaluation can result, albeit perhaps inadvertently, in restrictive or conformist practices in higher education. McInnis and Marginson (1994) were commissioned by the Department of Employment, Education and Training (DEET) to undertake a study of the impact of the 1987 Pearce Committee evaluation of Australian law schools. Their impact study clearly revealed that the Pearce Report, which followed the evaluation, had a considerable impact especially on those institutions where it had highlighted weaknesses. Its emphasis on library standards, for example, influenced law library developments and its advocacy of small-group teaching led to shifts in teaching practice (at least until deteriorating staff–student ratios undermined it). However, its main impact was the encouragement of a climate of debate, discussion, critical thinking, self-evaluation and continuous improvement. On the other hand, the report was almost counterproductive in some areas, not least its attempt to restrict Masters courses, its suggestion that one school might close, and its failure to grasp the significance of diversity. McInnis and Marginson note, however, that the impact of the Committee was no greater than concurrent policy changes in Australian higher education.

Similarly, Lee and Harley (1998) studied the impact of the British Research Assessment Exercise on the discipline of economics. They conclude that the RAE has led to the reinforcement of the primacy of 'mainstream' economics to the detriment of alternative approaches. This has happened because the RAE process has been appropriated by the 'mainstream' economics establishment, exemplified by the Royal Economics Society (RES). The RES's power came from its control of the 'reputational' system that is central to the organisation of academic work. Although the RAE could have undermined the control of RES, it had, on the contrary, reinforced it.

> By virtue of their already dominant position, the leadership of the RES was able to capture the process by which assessors were appointed to the economics panel. In particular, the Society actively supported the establishment of the Conference of Heads of University Departments of Economics (CHUDE) in 1987, whose most important activity was the selection of RES-acceptable candidates for the economics panels.

Consequently, the assessors appointed to the 1989, 1992 and 1996 panels were overwhelmingly mainstream economists holding significant positions within RES, or on the editorial board of *The Economic Journal* or a member of the CHUDE Standing Committee. The impact was that this 'rigged jury', whose 'paradigm-bound view' was that 'the quality of non-mainstream research is largely inferior to mainstream research' rewarded departments who did mainstream research and published in core mainstream journals (Lee & Harley, 1998, p. 198).

The result of this financial intervention has 'driven British economic departments to discriminate against non-mainstream research and the hiring of non-mainstream economists as well as to restrict if not eliminate the teaching of non-mainstream economics to students' (Lee & Harley, 1998, pp. 198-99). Thus, for example, Marxist economists on retirement are not replaced and courses of Marxist political economy are dropped. [2] For Lee and Harley, the message is clear, improve ratings and hence funding by hiring mainstream economists. The impact is the loss of non-mainstream research and teaching. A kind of 'academic cleansing'.

Such research suggests that more studies that address the micro-politics of quality evaluation are needed. These impact analyses, thus, move us clearly into the realms of the 'politics of quality'. It is not enough to undertake effectiveness or impact research that attempts to transcend the political dimension. This is a view endorsed by the British, Swedish and Norwegian *International Study of Higher Education Reforms* research programme, which has as its overall aim to:

> examine how higher education reforms have been received and implemented or counteracted by academic faculty and academic leaders; and to analyse how reform policies and structural changes have affected working lives, values, identities and productivity of academics in higher education institutions. (Bauer & Henkel, 1997, p. 1)

The overall picture, based on international seminar contributions, anecdote and published research, does not suggest that external evaluation has been particularly successful. Outcomes are often, it seems, temporary and not embedded in academic or organisational culture. Evaluations rarely engage directly with learning, let alone have any direct impact on it.

There has, of course, been considerable change in the higher education over the last decade but, it would appear, this has been driven by factors other than quality evaluation. Technological changes, massification, pressure for closer links to employment, general reduction in funding per head and internationalisation have been far more significant. Student learning is mostly affected by curriculum, organisation and technological change but this is itself more directly affected by professional bodies, teacher development and integrating new forms of communication and flexible course structure, which in turn are more likely to be market driven than initiated as a result of quality assurance. In effect, it seems that quality assurance is bringing up the rear, checking on changes rather than being a major factor in change.

Berit Askling, for example, explored the impact of the Swedish National Agency on Linköping University. She suggested that the Agency acted as a catalyst, rather than having a direct impact. That 'in a soft and supportive way it has... encouraged the institutions not to just establish routines for a management of quality but for elaborating

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[2] The 19 departments that increased their ratings overwhelmingly hired mainstream economists (82 out of 89= 92%). Those who did not improve their lower-end ratings (1–3) hired relatively fewer mainstream economists (37 out of 54= 69%).

infrastructures for quality enhancement' (Askling, 1997, p. 25). However, similar to Baldwin, she points out that although external quality monitoring has been a catalyst, 'it is itself a response to changes that are exerting great direct and indirect impact on institutions' (Askling, 1997, p. 25).

Copenhagen Business School is an example of an institution that has changed dramatically in a decade from a didactic teaching institution to a learning-oriented university. There has been a significant cultural change but this has been dependent on physical changes including new buildings and new technology, changes to course organisation linked to changing student numbers and finance, committed and secure senior management with vision and energy to drive internal changes, internal and a new generation of innovative staff. Evaluation has had some role in this but in rather complex ways. The national programme assessment undertaken by the Danish Evaluation Institute provided the impetus for a reconsideration of a stagnating programme but successive changes have been driven by committed staff and students via a democratic study board. In the scheme of things, though, the CRE audit and its follow up, entered into voluntarily by the institution in order to learn, have been a far more significant factor in the long-term changes. The institution continues to learn by participating in external evaluations, such as EQUIS, and a European benchmarking project. In the case of CBS, mirroring Horsburgh's (1999) analysis, evaluation is several steps removed from the real drivers of change, especially in the development of the university as a learning community.

Of course, the far-from-exhaustive evidence on impact could be construed as biased or misleading. More to the point, it could be construed as naïve to assume that quality evaluation is intending to lead to change and improvement. After all, as has been suggested, evaluation primarily has an accountability function in most countries. Value for money may be the principal driver and it has been suggested that quality evaluation simply legitimises and conceals deteriorating quality and standards (Harvey, 2002). However, opinion within all stakeholder groups is clearly divided on this point.

It might also be argued that accountability is a further obfuscation of the real purpose which is control. Maybe delegated accountability is merely a surface appearance and the real accountability process is not information generation, value for money or retaining credibility but as a vehicle for enforcing compliance to policy requirements. As Woodhouse and Middleton (1995, p. 262) remarked: 'getting compliance is exactly what is wanted'. If compliance is the real purpose of quality monitoring then it does not matter much if the outcomes or improvement are long-term, just as long as they last as long as the policy has currency. Of course, exploring this rather more cynical view of quality evaluation would require research into the implementation process. Recent work by Newton (1999; 2000) has suggested that implementation of quality policy is heavily mediated and that quality evaluation has unforeseen results, sometimes that operate counter to policy intentions. [12]

Conclusion

By way of conclusion, a personal view on what an external evaluation process would look like. To begin with, start in the right place. The starting point is certainly not the evaluation methodology. Nor is it the auspices and composition of the evaluating agency. The starting point is what is the current situation and what are its problems or shortcomings. On the basis of this identify the needs, if any, of an external evaluation process. Radically, be explicit about the politics of evaluation, so that the purpose of any evaluation is transparent.

Having established a purpose, examine how these external purposes relate to existing internal processes. Internal processes are vital to ensure the continued standard of qualification and the ongoing improvement of the education and research provided by the institution. Martin Trow (1995, p. 22) argues that 'internal reviews and assessments are more accurate and fruitful than those done by outsiders' a view reinforced by Bente Kristensen in her view of the Danish system. She notes that, while there can be a fruitful synergy between external and internal processes, external monitoring can never stand alone and 'will never be able to replace valuable internal quality monitoring' (Kristensen, 1997, p. 91).

Before taking the external evaluation process any further, establish what the internal procedures are. Ensure that the resulting external process will in principle mesh with the internal process. If the internal processes are not what they should be, make sure external processes encourage augmentation or change in internal processes and that the external processes will adapt to mesh with the revised internal process. In short, think of internal and external processes developing dynamically and in harmony.

Only at this stage start to define what external processes might specifically attempt to do and how they might do it. Bear in mind that 'successful' processes are characterised by dialogue, an improvement process, trust and transparency. Those that are costly, complex and burdensome are usually resented and can be counterproductive. There is considerable agreement (Karlsen & Stensaker, 1995; Saarinen, 1995) that the self-assessment process is valuable (although the real outcome can be hidden from evaluators if there are accountability repercussions). performance indicators and peer reviews are less useful (except perhaps to the visiting peers who learn a lot although rarely sharing their insights).

So, counter to all accepted wisdom, do not use peer review, which is amateurish, but use professional inspectors, properly trained and recruited from the sector, on two- or three-year non-renewable secondments. To avoid set piece performances, inspectors would have a 'patch' and would drop in and undertake 'enabling inspections'. Rather than a single event, inspectors would act like critical friends and work with managers, teachers and student representative to explore and promote innovation and improvement through one-one dialogue, interviews, and observation. Self-reflection would be ongoing and the outcomes could be reported on an annual cycle by the inspectors and discussed with university staff and managers. The process would be more professional, cheaper, less burdensome, more meaningful and far more effective. It would be linked into and encourage the critical development of internal processes.[13]

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[1] The other two are discussed later in the paper.

[2] CNE does not in any way accredit the institution

[3] Benchmarking is, currently, a widely-applied term although its use is far from consistent. The use by QAA in Britain is closer to the specification of a national curriculum than it is to the notion of direct comparative measurement.

[4] The Danish Centre for Quality Assurance and Evaluation of Higher Education is now part of the Danish Evaluation Institute with a broader brief.

[5] Third of three specified purposes of external monitoring.

[6] Private correspondence between members of the INQAAHE Board.

[7] The proposal also specified, in some detail, other criteria, aspects of methodology, and protocols.

[8] Double bookkeeping refers to the creation of two self-evaluations, a 'real' one for internal consumption and one, including required performance indicators, that is 'embellished' for external consumption. This embellishment appears to be irrespective of whether quality monitoring includes publication. This lack of openness is because universities fear revealing weaknesses or problems in self-evaluation because, in many countries, resources are used to reward strengths rather than combat weaknesses (Harvey, 2002).

[9] The predominant approach has been criticised elsewhere and this paper does not rehearse the advantages and disadvantages of self-evaluation, statistical indicators, peer-review and publication. For a critical analysis see Harvey 1998a.

[10] Westerheijden (2001) notes 'The USA are not a 'shining example' of how things should be, because the lag between shifting demands on graduates and the accreditation criteria is one of the most often commented shortcomings of its accreditation practices.'.

[11] The reviews draw heavily on Harvey (1999).

[12] Pursuing this, however, is beyond the scope of the paper.

[13] Appropriate internal process are suggested elsewhere (Harvey and Knight, 1996).