

Old Wine in New Bottles? A Comparison of Public and Private Accreditation Schemes in Higher Education

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Following national adaptations to the Bologna-declaration, accreditation is increasingly becoming the most dominant form of quality assurance of higher education in Europe. Over the last decade, national authorities have set up both institutional and programme accreditation procedures, currently accompanied by a growing number of private accreditation schemes. By comparing a random set of public and private, specialist and generic accreditation schemes in higher education, the article discusses the added value of accreditation in the governance of higher education, and the possible effects of an emerging 'accreditation market'.

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Introduction

The emphasis on accreditation schemes is the most dominant characteristic in European countries over the past few years. It reflects increased deregulation and new forms of governance in higher education, the emergence of new providers of higher education services and a growing internationalization of the sector (Westerheijden, 2001). In addition to emerging public national systems for accreditation, private higher education accreditation agencies are increasingly visible in the European 'market' for higher education (Schwarz and Westerheijden, 2003; Prøitz et al., 2004). The consequences of these systems for higher education, and for issues like quality, equality, equity and access in particular have not yet been explored. There is reason to believe that accreditation systems and their function of providing legitimacy to higher education institutions may have a marked impact. This article is a preliminary study into the potential effects of such systems.

Public and Private Accreditation — Issues for Consideration

External quality monitoring may be viewed as a systematic discourse — more or less focused — between higher education and its environment (Stensaker, 2000). In the case of external quality audits, for example, the discourse can be loosely structured around issues such as institutional management and leadership, how quality may be improved, and on the involvement the higher education institution displays in these issues (Amaral, 1998; Stensaker, 2000). Accreditation is often expected to represent a more structured discourse, where a certain threshold level is established (Prøitz *et al.*, 2004). To acquire accreditation is often of utmost importance for higher education institutions. In principle then, one may expect accreditation schemes to have high impact. In general, one often has recourse to accreditation for situations when (see, e.g., Ratcliffe, 1996; Eaton, 2001):

- one wants to assure at least a minimum degree of quality (especially in highly deregulated and privatized higher education sectors);
- when a certain degree of uniformity of study programmes is required (e.g., in professional fields);
- one wishes to stimulate increased student mobility.

However, since several accreditation systems now competing in the same market, an interesting situation arises: are we moving towards a situation where different accreditation systems offer market niches for institutions with special purposes and practices (Harvey, 2003)? Or are accreditation systems converging round more general issues and standards? While one outcome of the former might give rise to a system less transparent and more diverse, a consequence of the latter could work towards increased transparency but greater standardization. The dilemmas and consequences of this development is the topic of this article.

In general, accreditation is often criticized (see, e.g., Harvey and Mason, 1995; Harvey, 2004; Prøitz *et al.*, 2004) for:

- only focusing only on minimal standards while overlooking the challenge of quality improvement;
- being self-serving or self-protective instead of serving the public good;
- using narrow and quite specific criteria while disregarding the overall educational context (admission policies, equality and equity issues).

The increased visibility of higher education accreditation schemes public and private in Europe, and also worldwide, is an interesting development when related to the preceding points of criticism. While a majority of the new accreditation schemes emerging in Europe is state-owned or state-dominated in some respect (Danish Evaluation Institute, 2003; Schwartz and Westerheijden,

2003), private accreditation systems are emerging (Prøitz et al., 2004). Theoretically, one could imagine that public and private accreditation schemes would have a different profile set against the three points of criticisms just made. For example, state-owned accreditation schemes might pay more attention to issues of improvement, to the public good, and to the overall educational context than would private schemes. In developing public accreditation schemes a key consideration is not least to control 'for-profit' organizations whose motivations differ from those of the public sector (Harvey, 2004, 210). Yet, a central aspect in developing private accreditation schemes, especially in the US, has been to protect higher education from unwanted intrusion and regulation by public authorities (Orlans, 1992, 513). Hence, the links of state-owned or initiated accreditation schemes would expect to have to national educational objectives, to the spread of neutral and objective information about educational services and to particular national characteristics of the education sector, may not be present to the same degree in private accreditation schemes. These points are of particular relevance for the voluntary, private accreditation system in the US (Eaton, 2001).

In Europe, however, public accreditation has developed both as a response to 'for-profit' higher education, and also to address issues of transparency, mobility and quality as a take up of the Bologna-process and the objective to develop a European Higher Education Area. Given this construct, one may question how far such accreditation systems are also responsive to the 'public good' aspects of higher education (e.g. the need to take account of diversity in student recruitment, the social responsibility of higher education, fairness or ethics in curriculum design)? How far do such issues figure as important criteria given the major interest to develop more the international dimensions to accreditation schemes?

This situation poses the following research questions:

- 1. On what criteria do public and private higher education accreditation schemes currently use to base their decisions to accredit?
- 2. What are the main similarities and differences between public and private higher education accreditation schemes?
- 3. How far do public and private higher education accreditation schemes incorporate 'public good' aspects of higher education in the process of accreditation? (e.g., issues touching on access, quality improvement, transparency, fairness and public welfare).

Data and Methods

Six public and private higher education accreditation schemes in Europe and the USA were compared in respect of the themes and criteria they emphasize when arriving at a decision on accreditation. The six schemes focus on accreditation at the study programme level (institutional accreditation is not included) They reflect current issues in accreditation.

The six accreditation schemes were:

- the EQUIS-system, a private European accreditation scheme for accrediting business institutions that blur the distinction between institutional and study programme accreditation;
- the Accreditation Board for Engineering and Technology, Inc. (ABET)accreditation scheme, a US-based, internationally recognized private accreditation procedure for engineering programmes;
- the NOKUT-accreditation scheme, a public accreditation scheme which accredits all types of undergraduate/graduate study programmes in Norwegian higher education;
- the Dutch accreditation scheme, a public accreditation scheme applied to undergraduate and graduate study programmes in universities and professional higher education institutes in The Netherlands (and Flanders);
- the British Teacher Training Agency (TTA) (re)public accreditation process, that ensures all teacher training provision complies with the Secretary of State's requirements;
- the General Medical Council (GMC) which publicly accredits medical education in the UK.

The comparative analysis does not focus on how these accreditation schemes are conducted in practice, nor on the consequences of the accreditation decisions (e.g., whether the schemes are used for accomplishing a threshold level of for quality improvement). Rather, it examines the formal objectives behind the accreditation schemes, the important criteria used (see Table A1 in Appendix A), and thus the schemes' rationale and profile.

The Rationale and Profile of Some Public and Private Higher Education Accreditation Schemes

The EQUIS-system

EQUIS is an international system of strategic audit and accreditation, organized by the European Foundation for Management Development (EFMD). It is mainly aimed at institutions offering business education. EQUIS accreditation is voluntary (and institutions pay for the accreditation process). It has no legal standing — nationally or internationally. The main objectives of the EQUIS-system are to provide market information, to provide an instrument for comparison and permanent benchmarking, and to provide quality improvement throughout Europe. Institutions choosing the

EQUIS-system may decide whether they want to submit to an accreditation procedure or to a more improvement-oriented audit procedure. Only the accreditation procedure confers the award of the 'European Quality Label'. The audit procedure tests the institution's performance and market position in light of international standards, for example, to be used in further efforts at institutional improvement.

To achieve a full or a conditional accreditation, institutions must demonstrate that they satisfy quality criteria in three equally important areas:

- (1) High international standards of quality in all areas defined in the EQUIS-model;
- (2) A significant level of internationalization as defined within the EQUIS model;
- (3) Integration of the needs of the corporate world in institutional programmes, activities and processes.

The accreditation procedure consists of six stages following a preliminary inquiry:

- (1) formal application,
- (2) eligibility,
- (3) self-assessment,
- (4) international peer review,
- (5) awarding body decision,
- (6) guided development. Peer-review teams must follow a stipulated accreditation procedure developed by the EFMD (EQUIS, 2004).

Over the years, EQUIS quality criteria have been changed and developed (see Table A1 in Appendix A). The listing of recent quality criteria no longer includes 'contribution to the community', which was one of the central criteria only a few years ago (Prøitz *et al.*, 2004, 741).

The ABET-system

The Accreditation Board for Engineering and Technology, Inc. (ABET) is a private umbrella organization for the accreditation of study programmes in the fields of engineering, technology, computing and applied science in the US. Internationally, ABET also decides whether foreign engineering programmes are 'substantially equivalent' to ABET-accredited programmes (this is not considered to constitute accreditation). ABET also has mutual recognition agreements with foreign accreditation agencies. ABET offers only programme accreditation, thus the themes and criteria listed below concern only the accrediting of various engineering programmes.

For ABET, the purpose of accreditation is multiple. It notifies parents and prospective students that a given programme is above minimum standards; it informs faculty and institutional leadership of academic standards and ways to improve them; employers are informed about the skills of candidates; taxpayers are alerted that public money is spent well, as is the public in general. Accreditation is granted when a study programme is considered above minimum standards, and where the accreditation procedure has been based on the appropriate criteria, policies and procedures as laid down by ABET (for criteria — see Table A1 in Appendix A).

The accreditation procedure consists of six stages:

- (1) written application for accreditation,
- (2) initial evaluation (optional),
- (3) self-study report,
- (4) on-site visit by accreditation team;
- (5) accreditation by the appropriate commission of ABET
- (6) re-accreditation (interim accreditation) within a period of six years) (ABET, 2004).

For advanced programmes, specific criteria are set out for the curricular domain (e.g., the level of knowledge expected for advanced programmes and academic specialization), and faculty (e.g., that teachers understand current professional practice in a given industrial field). ABET also accredits experimental or innovative programmes on the basis of their demonstrated ability to satisfy the appropriate criteria and to produce graduates fully qualified to enter the practice in the appropriate discipline.

The NOKUT-system

The Norwegian Agency for Quality Assurance in Education (NOKUT) is a publicly owned and state-initiated accreditation and evaluation body for accrediting Norwegian higher education institutions and/or study programmes. Institutional, programme accreditation and audit are linked up in the following way:

- That a proper quality assurance system is functioning (evaluated through an audit procedure) and is the precondition to apply for any institutional accreditation.
- An institution is accredited in order to determine its type/level (e.g., private college, state college, university).
- Depending on institutional type/level of the institution, the institutional accreditation gives the institution the right to develop new study programmes (e.g., universities may develop new study programmes at PhD level).

• If an institution does not have this general right, programme accreditation is then carried out to ensure the quality of new programmes. This procedure is not voluntary if an institution wants to put on a particular programme of study.

In the case of programme accreditation, NOKUT's procedure goes through the following stages:

- (1) formal application for accreditation,
- (2) self-study report,
- (3) peer-review visit,
- (4) accreditation awarded or refused by NOKUT's Board,
- (5) re-accreditation (can be conducted at the initiative of NOKUT) (NOKUT, 2004).

In the event that a study programme cannot be accredited according to the quality criteria specified (see Table A1 in Appendix A), the institution is given 6 months grace to correct and adjust to the demands NOKUT puts forward. Afterwards, new accreditation process is implemented to check on action taken.

The Dutch accreditation system (NVAO)

Following the Bologna Declaration in 1999, and the introduction of the Bachelor–Master degree system, a shift has taken place from quality assurance to national accreditation of programmes. From 2002, accreditation was taken over by the Netherlands Accrediting Organization (NAO) now the Nederlands-Vlaamse Accreditatie Organisatie (Netherlands-Flemish Accreditation Organization) (NAO, 2004). NVAO's accredits all existing Bachelor's and Master's degree courses and validates new study programmes at government-funded higher education institutions as well as institutions approved (but not funded) by the Dutch government. Accreditation is a precondition for the government's funding a Bachelor's or Master's degree programme, for the right to award recognized diplomas and for granting financial assistance to students.

Accreditation entails 'awarding a hallmark that indicates that certain quality standards have been satisfied' (NAO, 2003). Accreditation is based on the existing quality assessment system and carried out at programme level. The objectives of the Dutch accreditation system are to create transparency in the education system; to uphold independent quality assessment; to permit international comparisons between degree programmes; to allow foreign course providers to have access the Dutch market; and continue raising the quality of Dutch degree programmes.

An institution applies for accreditation. The decision to accredit is based on a report from an external peer-review panel. The panel visits the institution as part of the process, which follows a five-year cycle. NVAO decides on whether to accredit on the basis of the panel's report. The decision is clear — yes or no. In the Netherlands, there is no conditional or provisional accreditation. The panel report must be based on the NAO accreditation-framework (NAO, 2003). Six topic areas or 'subjects' form the framework of the accreditation process. Each is broken down into subareas or 'facets', each drawing on appropriate criteria — in all about 30 (see Table A1 in Appendix A for specific criteria).

A degree of flexibility allows the programmes, panels or quality assurance agencies to operationalize them to reflect their particular needs. The process of operationalization must be set out in the panel report. In general, the agency uses an overall framework (which they present together with their application for registration), underpinned by domain-specific criteria. The judgement must be presented to staff and management, who, hopefully, will use the report to improve the course quality (Dittrich, 2003). The external panel is nominated by a registered quality assurance agency, known as Visiting and Judging Institutes (VJIs) that themselves must be registered. Such agencies may be from countries other than the Netherlands and Flanders. Selection is based on nationally developed criteria.

Each institute or programme is free to select an agency. Choice will be a strategic decision based on price, proven quality, or on the method of carrying the process out. However, doubt has been expressed about the capacity of the accreditation process to uphold the element of quality improvement from the previous system (Faber and Huisman, 2003, 238; Westerheijden, 2003).

Teacher Training Agency (UK)

The remit of the TTA is to raise standards by attracting able and committed people to teaching and by improving the quality of training for teachers and the wider school workforce.

Initial teacher training (ITT) in the UK is very tightly controlled by the TTA, which is mandated to ensure that teacher training is both of a high standard and operates within guidelines prescribed by the Department for Education and Skills (DfES). The Office for Standards in Education (Ofsted) inspects initial teacher training. Inspection (rather than peer review) is unusual in British higher education. The overwhelming emphasis of accreditation is compliance, with quality improvement a secondary feature. Nonetheless, the TTA claims that compliance leads to improvement in ITT (TTA, 2004c). A new Framework was put in place from the academic year 2002–2003, which laid down the basis for Ofsted inspections until 2007–2008.

ITT inspections ensure public accountability for the quality of initial teacher training; stimulate continuous improvement in the quality of provision; provide objective judgements on providers for public information; inform policy; enable the statutory link to be made between funding and quality; and checks compliance with statutory requirements (Ofsted, 2004).

Inspectors assess how far providers meet the *Requirements for ITT* (TTA, 2004a, c) and equip their trainees to meet the *Standards* required for the award of Qualified Teacher Status (QTS) (TTA, 2004b). These documents have legal standing and therefore constitute the essential criteria for assessment (see Table A1 in Appendix A). In applying these criteria, inspectors initially focus on three broad areas (Ofsted, 2004). Training quality; standards achieved by trainees; and management and quality assurance.

A four-point grading scale is in use: (A) very good, (B) good, (C) satisfactory and (D) unsatisfactory. Judgements on non-compliance judgement are treated separately. Non-compliance triggers the process for reviewing whether to start withdrawal of accreditation procedures. Inspection reports identify points for action and consideration by the provider and are available via the Ofsted web site (http://www.ofsted.gov.uk/). The TTA claims that inspection reports feed into its improvement strategy, which seeks to identify and disseminate successful practice, monitor policy implementation, identify providers requiring specific support or other intervention and encourages successful providers to help others experiencing problems. The Framework document (Ofsted, 2002) claims that 'inspection reports provide an invaluable source of information for providers' own improvement strategies' alongside their own on-going self-evaluation.

The general medical council (UK)

The GMC is a regulatory body established under the *Medical Act* of 1858. Its motto is 'Protecting patients, guiding doctors'. The Act confers upon it strong and effective legal powers designed to maintain the standards the public have a right to expect of doctors. The GMC is not a professional body with the role of protecting the medical profession. It is a registered charity. Its legal commitment is to protect, promote and maintain the health and safety of the public.

The GMC has responsibilities for medical education, set out in the Act (amended, 1983), which it meets via a statutory Education Committee. Among its statutory duties are the following: To determine the extent of the knowledge and skill required for the granting of primary medical degrees in the UK; to ensure that the universities provide medical undergraduates with the teaching and learning opportunities necessary to acquire that knowledge and skill; to determine the standard of proficiency required of the graduating medical

student; to ensure that the examining bodies maintain this standard at qualifying examinations/assessments; to determine the patterns of experience that must be undertaken by trainees during the Pre-Registration House Officers (PRHO) year (internship year); and to specify the form of the certificate to be completed by universities confirming that the required experience has been gained by trainees during the PRHO year. The GMC is thus responsible for registering medical graduates who are able to work as doctors in the UK. Without registration a person cannot practice medicine. Without GMC accrediting the medical school and its programmes, the qualification has little value.

In accrediting courses, GMC is moving away from an inspectorial approach to a quality assurance approach with greater emphasis on continual engagement and continual improvement, albeit with a good deal of control built in.

The GMC does not prescribe the way in which medical education is delivered. It is concerned that standards are consistent and maintained. It sets standards to describe the knowledge, skills and attitudes that new doctors should have. The latest standards are set out in *Tomorrow's Doctors*, first published by the GMC Education Committee in December 1993, recently revised in 2002 and scheduled for revision in 2006 (GMC, 2002).

Standards are checked via a quality assurance process intended as a continuous exercise. Each medical school is asked how it is meeting the standards set out in *Tomorrow's Doctors* (see Table A1 in Appendix A). The GMC arranges a visit to the school to confirm that this is so and to allow it to publish its views on where the school is doing well and where it may wish to consider developing its work further. Thereafter, the GMC will ask the school for yearly information updates and the school will be visited again at least twice in any decade (GMC, 2004). Regular reports are made to the Undergraduate Board about the information gathered. These reports are short and evaluative, setting out conclusions rather than the factual information on which such conclusions are based. It is formatted against the headings in *Tomorrow's Doctors* and *The New Doctor* (GMC, 1997).

Comparing the Public and Private Accreditation Schemes

The description of the various accreditation schemes illustrates interesting similarities and differences between public and private accreditation schemes. They shed some light on the potential consequences and effects of the emerging new accreditation 'market' in higher education.

First, the themes/criteria used by particular accreditation schemes show a similarity between public and private accreditation schemes (see Table A1 in

Appendix A). Apart from the institutional elements of the EQUIS approach, which blurs boundaries between programme and institution, there is a concentrated focus on input factors (qualifications of staff/student, infrastructure, design of curriculum, etc.), supposedly closely related to 'quality'. However, a growing attention is visible on outcomes (sometimes referred to as outcome standards). In some cases, the specific intention is to evaluate the outcome performance of students, competences and skills as well as knowledge.

Even if formally accreditation is related to checking or assuring minimum standards, all accreditation schemes studied pay attention to development issues in their descriptions of procedures and indicators. This is the second similarity. Hence, it seems that all schemes studied seek to address on one of the most criticized dimensions of accreditation — quality improvement. A study by Prøitz et al. (2004, 746) suggested, for example, that the EQUIS system focuses more on improvement than establishing a certain threshold level of quality. The present study suggests that this is not unusual for accreditation schemes. And this of course, has implications for the significance of accreditation in the future. Interestingly, the ABET scheme also highlights the accrediting of so-called experimental and innovative programmes — an initiative that can be interpreted along an 'improvement' dimension. Even in schemes where compliance with professional standards has the highest priority, examples of an improvement dimension are to hand. The TTA, for example, assumes quality improvement comes as a consequence of compliance. The GMC, in its role of protecting the public, emphasizes student competences standards, although it puts more emphasis than previously on continuous improvement through longitudinal engagement and dialogue.

Third, in most of the schemes, the emphasis on 'quality' criteria in both public and private accreditation schemes seems to lead to little or no emphasis on public good issues — regardless of ownership. The major difference is the compulsory accreditation undertaken by overview regulatory bodies, the TTA and the GMC, that both regard themselves as serving the public good through their insistence on training standards. For the GMC, this is its raison d'etre - protecting the patient. Incidentally, the GMC also notes, as part of the conclusion of its informal visits, that more should be done about public health on medical programmes. However, the interpretation of serving the public good is related more to 'micro'-issues (fairness of the accreditation procedure, ethics of the inspectors, skills of the candidates graduated) than 'macro' issues. Given the emergence of mass higher education and new groups of students entering higher education, there is little evidence in the six schemes of criteria specifying or hinting at the need for diversity in student recruitment, the social responsibility of higher education, cultural sensibility or ethics in curriculum design. A close scrutiny of existing documentation on these issues suggests that most accreditation schemes seem to argue that such criteria might actually hinder programme diversity and might be considered as intrusive. Indeed, some of the schemes imply elitist recruitment. In the case of the GMC, it has taken decades for it to propose new medical schools, improve access, and increase the numbers of trained medics. Thus, responsibility for addressing such issues is left to the individual programme (or institution). Interestingly, as noted earlier, the EQUIS-scheme removed 'contribution to the community' as a central quality dimension.

Given these similarities, are there major differences between public and private higher education accreditation schemes? Here, access to information about the accreditation process and its outcome figures large. All the private accreditation schemes studied have rules and quite strict regulations on information flow during and after accreditation, limit public access to, and insight about, the conditions that decide why a given programme has obtained accreditation. Public accreditation schemes are generally more open. The NOKUT-scheme, for example, gives the public access to reports from the peer-review team even before a formal decision for accreditation is taken by NOKUT's Board.

Another significant difference relates to the legal status of both accreditation and the accrediting organization. The GMC has had a legal obligation to control medical education going back to the 19th century. It is extremely powerful and controls as well as accredits medical education. Without registration by the GMC, no doctor can practice. Any programme not accredited is worthless. The TTA, in ensuring teacher standards, has a similar, albeit more recent, legal standing and control. Private bodies such as ABET or EQUIS are not in this league. NOKUT's and NVAO's accreditation, by comparison, is more benign by far.

In essence, differentiation is evident between compulsory and voluntary accreditation processes, between those with a specialist focus and those that are generic, between those well-established and the more recent. Long-established, specialist, compulsory processes, backed by a both legal framework and professional organizational structure are powerful and legitimated through their public control function. If a system is new, generic, non-compulsory, lacking legal backing or bereft of an organizational structure then the power and legitimation are far less, unless considerable effort is made to create it. Despite its relatively recent creation, the TTA, for example, has manipulated the political agenda to ensure its accreditation process is legitimate.

Conclusions

One may ponder over whether the long-established, specialist and compulsory accreditation process, often supported by a legal framework, has been the ideal behind the development of new accreditation schemes in higher education. As we have argued here, the new schemes have a long way to go before they can

hope to acquire such status. This fact does, on the other hand, not seem to dampen the eagerness to develop new accreditation schemes. We are currently witnessing an increase in the number of accreditation schemes globally (Vroeijenstijn, 2003). There is reason for believing that accreditation focusing on certain disciplines, professions but also institutions, will thrive also in the years to come. In the US, for example, the number of specialized accrediting bodies has risen from somewhat over 20 in the 1950s (Orlans, 1992) to 80 in 2001 (Eaton, 2001). Even if the great bulk of accrediting bodies in Europe are public, there are also indications that independent private actors are gaining ground (Prøitz et al., 2004), and that groups of higher education institutions are forming their own accreditation schemes (e.g., the European Consortium of Innovative Universities). In the UK alone, around a hundred regulatory and professional bodies are involved in some form of accrediting higher education programmes (Harvey and Mason, 1995), although this is not new. The growth of private accreditation agencies makes it important to examine thoroughly the potential consequences of accreditation, both in its public and its private species.

The questionable legitimacy of new accreditation schemes developed may have serious consequences for the legitimacy of the accreditation instrumentality in the future. The narrow focus on 'quality' in both public and private accreditation schemes makes accreditation vulnerable to other procedures and methods through which 'quality' may be visualized. Basically, accreditation has been a procedure to garner some sort of legitimacy both inside (Jones, 2002) and outside (Haakstad, 2001) higher education. Such legitimacy can be both informal and formal. Accreditation schemes are essentially procedures relating to formal legitimacy. Other options exist for higher education institutions to obtain the required legitimacy in the 'quality' area. Currently, two other options are visible as substitutes for formal accreditation. The emergence and multiplication of 'league tables' in higher education may be one such Ersatz. As many league tables are based on dimensions of reputation (Dill and Soo, 2003, 7), the legitimacy gained by being top in one of the popular and widely read league tables should not be underestimated (Meredith, 2004). The other option is to form strategic alliances with other higher education institutions, and forming 'clubs' to provide each other with the legitimacy necessary. The EQUIS criteria, with the emphasis on institutional standing, for example, bids fair to develop a cross-border club. The fact that The Consortium of European Innovative Universities has launched its own accreditation procedure may be interpreted in this spirit. Such procedures could reinforce the tendency identified in this study to restrict public access to information in private accreditation schemes, and make 'quality labels' more opaque and less transparent than ever.

Viewed from the perspective of governance, a number of weaknesses arise from the design and profile of current accreditation schemes. From this it may be suggested that the emerging 'discourses' around accreditation should pay more attention to how accreditation is related to national policy-making and policy implementation, and to the legitimating function of accreditation beyond the 'quality'-dimension. The important distinction in accreditation should not be on the public *vs* private dimension, but on the control/compliance *vs* autonomy dimension of higher education. Given the absence of interest in public good issues among which diversity in recruitment, the social responsibility of higher education, cultural sensitivity and ethics in curriculum design, it is questionable how one is to give place to such issues in the new governmental steering arrangements that are shaping up in Europe. The establishment of public accreditation schemes in Europe seems, so far, to have been 'old wine in new bottles'. Whether accreditation could be a more dynamic governing tool remains to be seen.

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Appendix A

The comparative analysis examines the formal objectives behind the accreditation schemes, the important criteria used, and thus the schemes' rationale and profile (see Table A1).

	EQUIS	ABET	NOKUT	NVAO	TTA	GMC
Institutional financial support	The institution demonstrates financial viability	Institutional support and financial resources (inc. support personnel and services)			Adequacy and effectiveness of resource deployment	
Resources and facilities		Adequate classrooms, laboratories, computing infrastructure	Infrastructure (library, teaching and learning facilities, ICT)	Facilities and provisions (physical)		Learning resources and facilities
Student support	Student services (e.g., effective professional student services)			Student guidance and information, including possible study-hindering aspects)		Student support, guidance and feedback
Teaching staff resource	Recruitment, development and management of faculty, support for personal development in skills like management, ethics, leadership	Sufficient faculty, skills and competencies	Appropriate level of qualifications in the academic staff and external examiners, adequate number of staff, pedagogic qualifications, research involvement	Quality and quantity, experience and expertise		

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Table A1 (Continued)

	EQUIS	ABET	NOKUT	NVAO	TTA	GMC
Teaching				Teaching performance judged against targets for student outcomes	Quality of tutoring and school-based training activities	Delivery of the curriculum, supervisory structures, teaching and learning
Student selection	HEI recruits and selects high quality students	HEI has and enforces procedures to assure that all students meet programme requirements			Procedures for selecting trainees	Appropriate student selection
Programme structure and content	Coherent programme design, staffing, administration and evaluation	Programme has educational objectives that are published. Programme criteria (e.g., basic knowledge within a certain discipline relating to the title of the programme)	An appropriate name, objective, curriculum and progression in the study programme and equal academic level as other similar programmes	Aim and objectives of the degree programme; content and structure of the programme (inc the relationship between aims and content, coherence, duration)	Course content and structure	Curricular content, structure: knowledge, clinical and practical skills
Programme outcomes		Programme outcomes and assessment (e.g., graduates apply		Results judged against targets	Standards achieved by trainees, includes	Curricular outcomes: the principles of professional

Table A1 ((Continued)
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	EQUIS	ABET	NOKUT	NVAO	TTA	GMC
		knowledge, conduct experiments, function in multi- disciplinary teams)			knowledge, professional values and practice	practice, putting the recommendations into practice, legal issues re: medicine
Assessment				Assessment and study load	Assessment of trainees	Assessing student performance and competence, principles of assessment, assessment procedures, appraisal, student progress
Professional element		Professional component (e.g., quantitative indicators on the required length of study modules in maths and science)				Confidentiality for medical students, the responsibility of students and HEI to protect patients
Research	HEI has a clearly defined research and publication policy					
International	Internationalization (e.g., of student		National and international	Process driven by Bologna,		

	EQUIS	ABET	NOKUT	NVAO	TTA	GMC
	body, faculty and programmes) (Not as strong in practice as in criteria)		cooperation (e.g., the existence of well-established international networks for students and staff)	internationalization of programmes and of evaluators		
Employer/ professional body links	Connections with the corporate world (e.g., input from practitioners in programmes, involvement of the corporate world in the institutional governance)					
Internal quality assurance	Programme evaluation	Process for evaluate the objectives, and a system of on-going evaluation	Evaluation (e.g., routines for assuring and development of the quality of teaching and learning)	Internal quality assurance system (periodic review, evaluation of results, measures for improvement, involvement of staff, students, alumni and the professional field	Quality assurance procedures and improvement planning	
National standing and scope	HEI is officially recognized and					

	EQUIS	ABET	NOKUT	NVAO	TTA	GMC
	regarded as a major quality institution and has substantial first-degree programmes and postgraduate programmes					
Mission	HEI has an articulated sense of mission					
Governance	HEI has an effective and integrated organization for the management of its activities					
Strategy	HEI has a defined, credible and coherent strategy					
Main method	Peer review	Peer review	Peer review	Peer review	Inspection	Peer review
Main purpose	Market positioning (audit for self-improvement)	Accountability		Accountability, claims improvement but contested possibility	Compliance and accountability, assumes improvement	Compliance aiming at continuous improvement

About the Author

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