ENHANCING QUALITY:
From policy to practice
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Foreword and acknowledgements

The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) are the common framework for quality assurance in the European Higher Education Area (EHEA). In 2014 the Bologna Follow-Up Group (BFUG) endorsed a revised version of the ESG that was proposed by stakeholder organisations, which has been formally approved by the EHEA Ministerial Conference in May 2015. Quality assurance in general, and the ESG in particular, are a recognised driver in enhancing the attractiveness and competitiveness of European higher education. The ESG 2015 include a number of updated and amended elements that undoubtedly bring implementation challenges, as shown in previous studies (e.g. MAP-ESG, Bologna progress reports).

The EQUIP project consortium aimed at enhancing quality through innovative policy and practice in European higher education by supporting and promoting a consistent, efficient and innovative embedding of the ESG 2015 at grass-root level. For doing so, the activities of the project have focused on identifying the challenges and working collaboratively with all stakeholders and policy-makers to propose, share and discuss the applicability of new solutions.

This publication constitutes one of the main outcomes of the project, and tries to highlight changes to be made in quality assurance at various levels and implementation challenges. The study contains also examples of concreate cases that overcame some of those challenges. Moreover, it puts forward European-level policy recommendations to feed into the discussions leading up to the 2018 EHEA Ministerial Conference and to upcoming initiatives from the European Union.

On behalf of the project consortium I would like to show my great appreciation for all those enthusiastic practitioners that attended the different project events and participated on the various activities. It is thanks to their contribution that this study was possible and their commitment was an encouraging factor for the project partners.

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Introduction

In May 2015, the Bologna Process Ministerial Meeting saw the formal adoption of a revised Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). This version built on the original ESG that had been adopted ten years earlier and had become a reference point for both internal and external quality assurance (QA) in European higher education. Studies (Costes et al. 2008, Loukkola & Zhang 2010, Crozier et al. 2011, ENQA 2011, EACEA 2012) showed that since then new QA agencies had been created or existing ones reformed in alignment with the expectations outlined in the ESG, external QA processes had been transformed and there had been a clear push within higher education institutions towards developing internal QA systems.

While there was a general agreement that the development of the European QA framework had been successful, there was also a realisation that it might benefit from updating due to the development of the higher education sector, as well as from clarification of terminology and removal of ambiguities (ENQA 2011). This was what led the Ministerial Meeting in 2012 to ask for the ESG to be revised.

The original ESG had been developed by four key stakeholder organisations: ENQA, ESU, EUA and EURASHE1, also known as the E4 Group. For the revision, the E4 Group collaborated with BUSINESSEUROPE, EI and EQAR2 to prepare a proposal for the Bologna Follow-Up Group (BFUG). The preparation of the proposal was accompanied by consultations and regular updates to the BFUG as well as the public at large so as to ensure buy-in from different stakeholders and facilitate continuity in the quality assurance developments (Crozier et al., 2016, p. 4).

In their article, which looked back at the revision process and discussed its impact, Crozier et al., (2016) expected that the most influential changes in the ESG would be those made to Part 1, dealing with the internal QA in institutions, and more specifically the introduction of a link between quality assurance

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1 European Association for Quality Assurance in Higher Education (ENQA), European Students’ Union (ESU), European University Association (EUA), European Association of Institutions in Higher Education (EURASHE)

2 Education International (EI), European Quality Assurance Register for Higher Education (EQAR)
and qualifications frameworks through standard 1.2 and the inclusion of a new standard on student-centred learning (1.3). While, in the first place, these changes put more emphasis on internal QA, they would also result in revisions to external QA. The authors further noted that the first feedback showed that users found the ESG 2015 more user-friendly and less ambiguous than the previous version. This was particularly the case when it came to the expectations towards quality assurance agencies and external QA processes.

Nevertheless, as the proposed ESG 2015 were discussed with various stakeholders, it became clear that there would be a need for training and dissemination activities after the adoption of the ESG. The EQUIP project – Enhancing Quality through Innovative Policy & Practice – was developed as a response to this need. The purpose of the project, which is co-funded by the European Commission Erasmus+ programme, is to support and promote a consistent, efficient and innovative embedding of the ESG 2015 at grass-roots level. During the project timeline (2015-2018), the project partners have carried out a variety of activities aimed at ensuring that the European higher education community is aware of the ESG 2015 and at supporting users in facing challenges in using the ESG 2015. Further details on the project partners and the key activities are described in Annexes 1 and 2 respectively.

As part of the project aims to contribute to the long-term development of quality and quality assurance in the European Higher Education Area (EHEA), this report examines the impact of the ESG 2015 – the changes in practices and innovative approaches to implementation. It draws on the evidence and case examples collected during the EQUIP workshops, webinars, surveys and focus groups as well as other available material.

The rest of this introductory chapter explores some of the key concepts in the introduction of the ESG 2015, which provided a starting point for discussions in the EQUIP activities. The second chapter discusses the key challenges and areas of debate in implementing quality assurance in line with the ESG 2015 and makes related recommendations to the different stakeholder groups. The final chapter summarises the lessons learnt and concludes with some overarching recommendations for developing the quality of higher education. Throughout this report, cases illustrating concrete practices are presented in boxes to give some indicative examples of how stakeholders in some countries are tackling some of the QA issues discussed.
Assuring and improving quality in the EHEA

The ESG provide guidance on how QA processes in the EHEA should be carried out, but they do not present standards for quality in higher education per se (ESG 2015, p. 6). Based on an analysis of scholarly literature, Schindler et al. (2015) found that the concepts of quality have not changed much in recent decades and identified four main categories of how quality is defined:

- As something that conforms to a defined mission or purpose or a set of standards or criteria (purposeful);
- As something that leads to a positive change in student learning or personal growth (transformative);
- As being accountable to different stakeholders by using the available resources in an optimal manner (accountable);
- As something exceptional or achieving high standards (exceptional).

While the ESG have been influenced by all four categories, they do seem to mostly advocate in favour of quality of higher education being measured in terms of its fitness-for-purpose. If this approach is taken, the purpose of higher education must then be defined. In this regard, the ESG refer to the four purposes previously introduced by the Council of Europe: “preparing students for active citizenship, for their future careers (e.g. contributing to their employability), supporting their personal development, creating a broad advanced knowledge base and stimulating research and innovation” (ESG 2015, p. 7). In the same way that separate
stakeholder groups may define quality in different ways, they may also value the purposes of higher education to differing extents. Variations in the perceptions of these two issues were explored in the focus groups with different stakeholders.

The ESG acknowledge that quality is not easy to define, but do note that it is mainly the result of the interaction between teachers, students and the institutional learning environment (ESG 2015, p. 7). As such, through the expectations towards internal QA that are outlined in Part 1, it can be argued that the ESG provide guidance on what is considered to be a good quality learning environment.

Furthermore, as Crozier et al. (2016, p. 6) noted, during the revision of the ESG, a broad range of issues were brought forward as needing to be addressed through QA, leading to a discussion on the purpose of the ESG and quality assurance. In response, the introduction to the 2015 version places quality assurance firmly into a broader context by stating that the ESG “should be considered in a broader context that also includes qualifications frameworks, ECTS and diploma supplement that also contribute to promoting the transparency and mutual trust in higher education in the EHEA” (ESG 2015, p. 6).

Thus, the ESG are just one of the tools that contribute towards the development of quality higher education. Some of these tools, including QA, have been promoted as part of the Bologna Process, which has framed a number of the key developments in European higher education in the first decade of this century. Others have been initiated by other actors, but have found traction at the European level and play a role in supporting the quality of higher education. Box 1 summarises the most typical tools and steering mechanisms brought up in discussion about the quality of higher education and typically found either at the level of higher education systems or used at institutions.
What then is the role of QA?

In short, the ESG read that QA processes “should ensure a learning environment in which the content of programmes, learning opportunities and facilities are fit for purpose” (ESG 2015, p. 7). Beyond this, and in line with recognising the diversity of QA approaches across the EHEA, they also leave room for defining the purpose of QA according to the context, while making references to it needing to be fit-for-purpose (cf. standard 2.2). Nonetheless, in broad terms two main purposes of QA can be identified: demonstrating accountability and enhancing quality. In addition, the importance of contributing to transparency and provision of information on higher education is also recognised as one key task of QA processes.

Box 1: Tools and steering mechanisms complementary to QA

**Benchmarking**
In a general manner, benchmarking refers to the practice of evaluating an institution, programme or a process by comparing it to a given standard. However, in the context of quality development it is also often used to refer to a process where an organisation seeks to improve its performance by comparing its processes with those in another organisation with a similar profile.

**Diploma Supplement**
The Diploma Supplement is a document provided by an institution to accompany a higher education qualification, giving a standardised description of the nature, level, context, content and status of the studies completed by its holder. The template for the Diploma Supplement has been agreed upon by the Council of Europe, the European Commission, and UNESCO (EHEA website).

**ECTS**
European Credit Transfer and Accumulation System (ECTS) is a learner-centred system for credit accumulation and transfer, based on the principle of transparency of the learning, teaching and assessment processes. Its objective is to facilitate the planning, delivery and evaluation of study programmes and student mobility by recognising learning achievements, qualifications and periods of learning (ECTS Users Guide, 2015, p. 69). The ECTS was developed by the European Commission and the revised version of the ECTS Users Guide was adopted by the EHEA Ministers in 2015.
Excellent Initiatives
Initiatives or strategies are usually at either system or institutional level, for “fostering, recognising and rewarding excellent practice in teaching and learning”. Such schemes can focus on a variety of aspects, both in terms of the unit in focus (e.g. individual teachers, teams of teachers, individual programmes, an institution as a whole), or the area of achievement (e.g. teaching, innovation, leadership, impact or collaboration) (Land & Gordon, 2015).

Key Performance Indicators
Key performance indicators are quantifiable measures used to evaluate the extent to which an institution or sub-unit (such as a faculty, department or programme) has met objectives set for its performance, typically set out in its strategic plan or equivalent.

Learning Outcomes
Learning outcomes are statements of what an individual knows, understands and can do on completion of a learning process. Learning outcomes can be attributed to individual educational components and to programmes as a whole. They are used in qualifications frameworks to describe the level of the individual qualification (ECTS Guide 2015). There have recently been projects aimed at assessing achieved learning outcomes at European and international level in a manner that allows comparison between higher education systems, institutions or programmes, such as OECD’s AHELO and the ongoing CALOHEE project co-funded by the European Commission.

Qualifications frameworks
A qualifications framework is an instrument for the development, classification and recognition of skills, knowledge and competencies along a continuum of agreed levels of education. It is a way of structuring qualifications, which are defined by learning outcomes. A Qualifications Framework indicates the comparability of different qualifications and how one can progress from one level to the next (ILO 2007).

Performance-based mechanisms
Performance-based mechanisms are related to an institution’s actual or intended results over a certain period. They may be based on outputs, such as the number of graduates, or inputs, such as the number of students/staff with certain characteristics. Performance-based mechanisms may take the form of performance agreements/contracts and payments for results in research and/or education (EHEA website).

Rankings
Rankings of institutions compare the performance of institutions to each other using specific criteria and present the information in a form of rating or ordering. Depending on the ranking, the indicators selected may reflect the institutions’ or programmes’ performance in different activities, but the most well-known global rankings tend to focus on indicators reflecting the institutions’ performance or reputation in research.
Themes arising: examining changes and challenges in QA

This section discusses five broad themes that cover the key issues arising from the EQUIP activities, such as the surveys, workshops and focus groups for individual stakeholder groups (namely students, academics, individuals with institutional responsibility for quality assurance at universities and at other higher education institutions, staff of QA agencies and representatives of ministries for higher education).

The first theme reflects on the diversity of external contexts in the EHEA and the influence that this has on the development and implementation of QA. The second and third themes are to a certain extent interlinked – how institutions ensure and demonstrate the relevance of their educational offer in practice, and how they and QA agencies communicate about their work. The fourth theme is the tension between different perceptions of QA: on the one hand as a bureaucratic process and on the other hand as a means for fostering quality culture. This issue is by no means new, but is brought up continuously and therefore deserves attention. The final theme addresses the most obvious change between the ESG 2005 and 2015: the new standard on student-centred learning (1.3) and corresponding changes in the standard related to teaching staff (1.5).

Diversity of external contexts and legal frameworks

The diversity of QA approaches across Europe reflected in and accommodated by the ESG is visible in both external and internal QA processes and has a clear impact on the implementation of the ESG, which were deliberately developed to be generic rather than detailed.

This diversity can at times be explained by the different purposes assigned to higher education. As mentioned in the previous chapter, the Council of Europe
defined four different purposes of higher education and these were explored with participants of the focus groups. Traces of all four purposes were identified by all stakeholder groups, in relation to their national higher education and QA system and the policies of their institution or agency. However, some differentiations could be identified. For example, although the purpose that was perceived as currently receiving least attention across the board was that of active citizenship, the student representatives felt that there was more focus on this than the other stakeholders did. Despite this perceived neglect, many institutions and systems do have measures in place to support the societal contribution of students and raise their awareness of their role as citizens, and others are in the process of introducing such initiatives, perhaps reflecting a growing awareness of this aspect of higher education. Some examples are provided in Box 2.

All stakeholder groups reported that the most emphasis was placed on knowledge creation and employability, although the balance between these two differed according to certain factors. For example, those from professional higher education unsurprisingly put greater focus on employability. A similar emphasis was also seen among representatives of ministries for education. Political and economic issues also played a role, for example in countries that had a greater problem with youth unemployment (as a result of the economic crisis), higher education systems appeared slightly more oriented towards employability than other purposes.

There was also a sense that institutions and systems tended to focus more on aspects of higher education that are tangible and easier to measure. As such, this leads to a bias towards knowledge development and employability over the less tangible personal development and active citizenship.

The diversity of profiles of institutions and different balances in addressing the purposes of higher education is encouraged and is indeed an often-cited strength of the EHEA. Nonetheless, it is recommended that each institution is clear about its own mission, and the aims of its programmes.

On a policy level, it is interesting to note that the Renewed EU agenda for higher education, published by the European Commission in 2017, marks a departure from the EU’s previous focus on education mainly as a contributor to economic growth
and employability (e.g. the EU’s 2011 *Agenda for the modernisation of Europe’s higher education systems*). Instead, it pays more attention to the links between higher education and civil society, and the need to prepare students for their role in that society. Similarly, the *Renewed EU Agenda* also emphasises the connection between education and research, a link also made in the ESG.

**Box 2: Supporting citizenship through higher education**

The Norwegian University of Science and Technology (NTNU) runs an ethics module (worth 7.5 ECTS) that is compulsory for all undergraduate students, regardless of their degree programme. The national legal framework allows for such courses to be built into the curriculum, and NTNU puts emphasis on it as part of their belief in educating students not only for work, but also for life. The university now plans to go a step further and is exploring how to integrate ethics education into the curriculum as an embedded strand running all the way through a degree programme, rather than as a stand-alone module.

The Vrije Universiteit Brussel in Belgium offers an interdisciplinary service-learning module through which teams of students from different disciplinary backgrounds (e.g. business studies, law, psychology) work with a local small businesses to support them in a particular area of their business development. In this way, the students not only gain experience of working in a real work environment, but also develop their team work skills by cooperating with other students who have knowledge of a different subject area.

In May 2017, a new law was introduced in France requiring all institutions in the country to offer ECTS credits for a range of voluntary activities carried out by students. The aim is to recognise the societal contribution made by many students and the competences that they gain through this engagement by allowing it to count towards their degree programme (*Journal officiel de la République Française*, 2017).
Beyond the impact of the purpose of higher education, the diversity of QA approaches typically stems from historic and cultural differences or from the structure of a national higher education system, in which the division of responsibilities between different actors may vary considerably. This division of responsibilities was discussed in the focus group with representatives of education ministries from across the EHEA. There it was reported that while defining the aim of the external QA system is in most cases carried out by the ministry, the role of developing the methodology for the system is often shared between the ministry and the QA agency, with the former deciding on the general framework, and the latter focusing on the concrete practicalities of how to implement the QA system. In many cases it was noted that there was a consultation process with a range of stakeholders. Most participants of the focus group found that the legal framework in their systems allowed for compliance with the ESG. But in the course of the project, some examples of contradictions were brought up, particularly in relation to standards 2.6 (Reporting) and 2.7 (Complaints and appeals).

Across the systems represented at the focus group, the role of conducting the external reviews fell exclusively to QA agencies, although a variety of bodies were responsible for the final decision-making (if applicable). Differentiation was also reported with regard to the appeals process, with some systems having a division of responsibilities depending on the type of appeal (against the procedure or the decision), which largely reflected the corresponding division of roles between carrying out the review and making the final decision.

In some cases, the division of responsibilities is closely linked to the overall role of external QA in a country’s higher education system and the purposes assigned to it. The 2015 Bologna Implementation Report noted the diversity in the focus of external QA in terms of whether it focuses on institutions or programmes or both. It also reported that in two thirds of the EHEA countries the external QA is geared primarily towards accountability and in one third primarily towards enhancement (p. 90). This finding has not changed significantly according to the draft 2018 Implementation Report (forthcoming).

Box 3 illustrates how external QA can play different roles, and how responsibilities can be divided between different actors, while remaining compliant with the ESG.
Regardless of the how external QA is organised in a system, it is recommended that its purpose and the division of responsibilities is made clear to all actors as this plays an important role in fostering trust and transparency both within and between systems. This provides a stronger framework for mobility and cross-border cooperation.

The EQUIP activities showed that reforms of external QA systems in Europe continue to be frequent, which adds another layer of complexity. Often, these reforms stem from a need expressed by the higher education community (from both institutions and QA

**Box 3: Role of external QA and division of responsibilities**

In Finland, the role of external QA processes, quality audits, is to support institutions in developing their internal quality management systems. Passing or failing an audit has no impact on recognition of degrees awarded or on funding. Decisions on these matters are made by the Ministry of Education and Culture through legislation and the four-year performance agreements, which have no explicit link to the quality audits or involvement of the QA agency (ENQA 2017a).

In Denmark, the role of the external QA process is to produce a report on the basis of which a decision regarding the accreditation of a higher education institution and its programmes can be made. The Danish legal framework stipulates that the reports are prepared by the Danish Accreditation Institution, while the decision is taken by the Accreditation Council using the overall assessment and recommendations of the reports as evidence (ENQA 2016).

In the case of the Croatian higher education system, the appeals system for initial accreditation of study programmes and for the accreditation of institutions is not under the responsibility of the QA agency, ASHE, but is regulated by the ministry. Institutions can only appeal by filing a lawsuit against the final decision to the ministry (ENQA 2017c).
agencies) to review and amend the processes, for example at the start of a new audit or accreditation cycle, so that they continue to serve their purpose and do not become too repetitive. This is particularly relevant in systems with a longer history of external QA, in which institutions may have already undergone many cycles. However, discussions in the focus groups also raised the matter of what influence factors outside QA – mostly political – have on the design of the external QA system. Hopbach (2012) has discussed these dynamics between policy-making and external QA describing it as a pendulum balancing between accountability, trust and changes in society.

All these other factors make it very difficult to measure the exact impact of the introduction of the ESG 2015. In their responses to an EQUIP survey, many agencies explained that while they had made or were planning to make changes in their processes, these were not explicitly as a consequence of the revision of the ESG. Instead, they are due to the ongoing review and revision of agency criteria, or are prompted by changes in the national legislation or national approach to QA. In these cases, the ESG have been taken into account but are not the trigger for developments.

While changes in external QA were discussed by all stakeholder groups, the rationale and motivation for the changes were at the centre of attention in the focus group for the QA agency staff. Here, the tensions that exist in some systems between the policy-makers and the QA agency became clear, whereas these dynamics did not come across so plainly in the discussions with other stakeholder groups, who are less likely to differentiate explicitly between the QA agency and the ministry.
In cases where the agency felt to a certain extent side-lined in the development of a new system, their lack of influence revolved typically around the mission and goals of the external QA system, particularly when there were changes in governments and their political aims. In other systems, the agency was driving the changes or was at least very actively involved in the development of a new system, resulting in better alignment with the ESG and broader stakeholder buy-in.

In order to ensure that legislation is not a barrier to implementing the ESG and to increase ownership of the external QA framework, **public authorities are recommended to adapt legal frameworks so that QA agencies and institutions can meet the expectations of the ESG and make certain that regulations determining the basic design of the external quality assurance system are fit for purpose**. A key part of this is to engage stakeholders in discussing the purpose and design of the system and, as such, **QA agencies are encouraged to be proactive in participating in any consultation process**.

While alignment with the ESG is an important consideration in the basic design of QA systems, it was nonetheless discussed in the focus group with QA agency staff that in some systems questions are being raised as to whether peer-review will remain the basis for external QA (as specified in standard 2.4). Examples were provided from systems where increasing emphasis is placed on the use of metrics (see one example in Box 4). This type of approach relies on institutions having sufficiently developed internal information systems to provide accurate and up-to-date data, and indeed can prompt institutions to improve this, but also raises questions about metrics being used as a proxy for quality.

The problem of finding relevant and meaningful indicators on teaching is well documented through various studies that have been carried out since the 1980s. Indicators that seek to focus on teaching and learning (as opposed to research) such as staff/student ratios, drop-out rates, time to graduation and student satisfaction surveys, may all have a role to play, but each has its limitations in reliably reflecting the learning and teaching processes (for example, student surveys often do not demonstrate the effectiveness of teaching and can be distorted by various biases, such as gender). Furthermore, and this has often been noted, what is measurable is not always meaningful or relevant and what would be meaningful is not always measurable.
While understandably the impact of overall design of the higher education system was raised more frequently in the discussions around external QA, it also has a profound impact on the design of internal QA. There are several examples of areas in which national regulations have major consequences for how an institution addresses certain aspects of the ESG. For example, the need to refer to the national qualifications framework in programme descriptions (standard 1.2) relies on the framework being in place at national level. However, while progress has been made since 2015, the draft 2018 Bologna Implementation Report (forthcoming) indicates that there are still a significant number of countries that have not self-certified the compatibility of their national qualifications framework with the QF-EHEA.

Another example is that student admission criteria (standard 1.4) are often influenced by national legislation on access to higher education (whether institutions can set their own criteria, or there is a national numerus clausus, or all eligible candidates have a right of access). Thus, the external environment can have major consequences for how many aspects of internal QA are organised.

Box 4: Use of metrics in external QA

Some countries are putting increased emphasis on the use of metrics for external QA and the UK is one of the most prominent examples of this. Metrics play an important role in the UK in two recently developed strands of the external QA system: the Annual Provider Review (APR) and the Teaching Excellence Framework (TEF). Through the APR, the Higher Education Funding Council for England (HEFCE) uses a wide range of data to inform judgements about quality and standards at institutions. Through TEF, a committee reviews a more limited set of data, as well as supporting statements provided by the institutions themselves, to allocate gold, silver or bronze awards for teaching quality. The core data used in both exercises are drop-out rates, outcomes of the national student survey that gathers opinions from final year undergraduates about their experience at university, and employment or further study statistics taken six months after graduation. In both exercises, data is benchmarked in order to give an indication of whether the institution is performing above or below expectations given its operating context (Hazell & Cullis 2017).
Institutional responsibility for quality

There was a consensus among all stakeholders about the fundamental nature of internal QA: the role of institutions in taking responsibility for assuring and enhancing the quality of their provision, and the need for each institution to develop an internal QA system that is fit for its specific internal context. External QA regimes regulate the design of internal QA to varying degrees, but participants of the focus group for ministries reported that the principle of institutional responsibility is typically enshrined in the law. The level of regulation may stem from many factors, including the maturity of the external QA system and whether the external QA system focuses on compliance or enhancement.

The type of guidance issued by a QA agency is also dependent on the level at which external QA is carried out. In recent years there has been an increase in the number of countries and systems in which the focus is on institutional QA systems or in which it is at least offered as an option for institutions. As information held by EQAR indicates, in some countries programme accreditation is only required if institutional accreditation is not achieved or that a lighter touch approach is applied to the external QA of programmes (EQAR website).

The shift in the external QA approach has direct consequences for institutions’ internal QA systems. Rather than relying on the agency to arrange the periodical review of study programmes against its criteria, the institution is expected to do this independently, using either self-defined procedures and criteria or those provided externally, and draw
In 2015, the Flemish external QA framework changed to an institutional rather than programme level approach. After the pilot round of institutional reviews, an overview report by the Accreditation Organisation of the Netherlands and Flanders (NVAO) concluded that this change had led to the further development of quality culture at institution level and allowed institutions to design internal QA systems that were relevant for their own context (NVAO 2017).

One example of this is at KU Leuven, where they introduced a new system that involved internal review at three levels: programme, faculty and university over the course of the academic year. Each level conducted discussions with stakeholders and produced reports with reflections, good practices and possible actions, which fed into the discussions at the next level. As this was a new approach for the university, a trial run was implemented in 2015-16, with built-in monitoring and evaluation measures in order to examine how the approach could be improved in future years (Annaert et al. 2017).

**Box 5: Adapting to an institutional level external QA approach**

In 2015, the Flemish external QA framework changed to an institutional rather than programme level approach. After the pilot round of institutional reviews, an overview report by the Accreditation Organisation of the Netherlands and Flanders (NVAO) concluded that this change had led to the further development of quality culture at institution level and allowed institutions to design internal QA systems that were relevant for their own context (NVAO 2017).

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In parallel to this, the ESG 2015 put more emphasis on the need for continuous monitoring of programmes by separating this issue from that of design and approval of programmes and putting it in its own standard (standard 1.9 – in the ESG 2005, these activities were combined under a single standard). EUA concluded in 2015 that there is not sufficient information available to allow a European level overview of how exactly internal programme monitoring and review are carried out at institutions in the EHEA but that there is increasing pressure for institutions to demonstrate that they are doing this in a credible manner (Gover et al., 2015, p. 25).
Participants of the EQUIP focus group identified a range of measures that contribute to internal programme review used at institutions with which they were familiar. Some examples are provided in Box 6.

Specific issues raised in the focus group for universities included the extent to which an institution should involve an external peer perspective in their internal reviews; how an institution can demonstrate to the QA agency that the measures are in place and effective; what kind of evidence is requested and provided and whether the institutional information systems are able to meet these needs. In the focus group for institutions offering professional higher education, the questions posed, perhaps not surprisingly, were more explicitly linked to how to involve employers in programme review while at the same time finding an appropriate balance between the expectations of the different stakeholders towards a programme and its graduates, and also how to measure and provide evidence of the learning outcomes and gained competences in a robust manner.

Indeed, the examples above serve as illustrations of two different approaches towards the design of internal QA. In one approach, the institution aligns QA with strategic management and defines the role of QA as a means to support the achievement of institutional goals. In the other approach, internal QA is explicitly linked to defining and assessing the learning outcomes and ensuring these are aligned to the national qualification framework. In the EQUIP focus groups the first approach was dominant among universities, whereas institutions offering professional higher education focused on the second approach.

Both approaches (QA being aligned with institutional strategic development or with student learning outcomes) are present in various standards of the ESG Part 1 but, interestingly, they are also visible in the QA policy statements of EUA (2010) and EURASHE (2012), reflecting the composition of their respective memberships. However, while different balances between these approaches were evident in the focus groups, it should also be pointed out that sometimes it is the external QA system, rather than the institution type, that steers the focus towards one approach or another. Recognising the impact of the external QA system on internal QA, QA agencies and other relevant bodies are recommended to design external QA in a way that allows institutions to take into account their own specific context when developing their internal systems.
**Box 6: Tools and sources for collecting information about programmes**

The following activities (presented in no particular order) were identified during the EQUIP focus groups when discussing possible tools and sources for institutions to use in order to collect information about their study programmes.

- Cyclical internal programme review
- Reviewing clusters of programmes together
- Thematic approaches to internal review (attention to specific common themes when reviewing groups of programmes)
- Process: self-evaluation; review of information, including measurements and indicators, input from strategic and academic levels; future planning
- Monitoring data: internal (results, progression, etc.) and external (labour market performance, employment rates)
- Programme evaluation and development workshops involving all stakeholders for a specific programme
- Internal committee, programme board, academic senate
- Focus groups/panels as a method to gather more detailed feedback
- Collecting feedback/input from academic staff
- Round-table discussions with employers and alumni
- Reports from the programme directors
- Involving external examiners
- Annual feedback (through surveys) from students, alumni, other stakeholders
- External accreditation (e.g. for professional programmes) to ensure compliance with professional standards
From an institutional perspective, focus groups participants expressed a wide range of views as to how much prescriptive guidance on internal QA was desirable or necessary. These differences in opinion may be linked to the issues mentioned above, as well as the maturity of the institution’s internal QA system, whether it is facing the need to review its system due to regulatory changes or simply cultural differences.

Beyond the guidance provided through formulation of criteria and any handbooks to assist institutions through the practical steps of an external QA process, many agencies also support institutions in other ways. In the focus group for QA agency staff, the question was posed as to how far an agency can go in this regard without jeopardising the objectivity of its external QA processes (see Box 7 for one example). A recent revision by the EQAR Register Committee to the *Use and interpretation of the ESG* (EQAR, 2017a) highlights the fact that the work of QA agencies has become increasingly diversified, with many offering consultancy services and training opportunities separate from any quality enhancement embedded in their usual external QA process. This raises conflict-of-interest issues if the two strands of activities are not sufficiently separate and brings up questions about the role of the QA agency.

**Box 7: Balance between advisory and regulatory work of QA agencies**

In the external review report of the Lithuanian QA agency (SKVC), the review panel noted that the agency offers “guidance and assistance to HEIs at various occasions and in various forms, for example when preparing for an evaluation procedure”. This was considered to be beneficial, particularly for institutions with less developed QA systems. However, it raised concerns that some of the advice offered in preparation for an evaluation procedure, specifically regarding how to organise the self-evaluation, was rather extensive and prescriptive. As such, in the panel’s view, it risked undermining an institution’s autonomy and trust in its procedures. The panel therefore recommended that the agency should “diminish its advisory role substantially” (ENQA 2017b). The EQAR Register Committee agreed with this finding and underlined that the agency is “expected to demonstrate a clear separation between its external quality assurance and its consulting and guidance role, in particular considering the agency’s assistance in producing self-evaluation reports” (EQAR 2017b).
Communication about quality assurance

The need and importance of communicating about quality assurance, specifically its purpose, how it works and, crucially, its results and what they mean was a theme that emerged throughout the project activities. The reasons for this are two-fold: first, there are specific standards related to this in the ESG (1.8 and 2.6) and, second, there are additional pressures for this coming from outside QA.

While QA has continuously been high on the policy agenda thanks to the Bologna Process, it has been challenged for not contributing sufficiently to the provision of easily understandable public information on the quality of higher education. This debate is of interest also in the light of the rise of rankings and metrics as sources of information that are arguably more accessible (despite their flaws as discussed previously). As a result, the value of QA may be questioned, with the accessibility, comparability and usefulness of the information on quality assurance becoming a particular issue.
With regards to the provision of reliable information to the public through external QA, some recent improvements can be identified. Standard 2.6 of the ESG explicitly stipulates that full external panel reports should be made public, whereas this had previously been a point of debate with some agencies that did not do so (Vercruysse & Proteasa, 2012, p. 32). Similarly, in some higher education systems, external QA reports which led to a negative decision have not been published (Vercruysse & Proteasa, 2012, p. 32 and EC/EACEA/Eurydice, 2015, pp. 92-93). The revised formulation of the ESG standard on reporting implies that they should and, furthermore, EQAR specified that in order to be included in the Register, an agency should publish all reports, regardless of the resulting outcome (EQAR, 2017a, p. 8). A further contribution to facilitating the accessibility of reports, which goes beyond the work of individual agencies, is a database of external quality assurance results currently under preparation by EQAR (see Box 8 for further details).

The revised standard 2.6 leads to two challenges in relation to the use of QA reports as a means of communication. First, it is unclear to what extent the public is aware of which agencies work in a reliable manner in accordance with the ESG. Second, there are some higher education systems in the EHEA where it is not up to the QA

**Box 8: Database of external quality assurance results**

In 2017 EQAR set out to develop a database that would enhance access to reliable information on the higher education institutions/programmes that were subject to external quality assurance in line with the ESG. The database will collate and offer direct access to reports and decisions from all registered agencies, which is expected to contribute to the transparency of external QA outcomes and thus facilitate the recognition of academic qualifications.

The database has been designed to respond to the information needs of a broad range of users, including recognition information centres (ENIC-NARICs), recognition officers in higher education institutions, students, quality assurance agencies, ministry representatives and other national authorities, and support different types of decision-making (e.g. recognition of degrees, mobility of students, portability of grants/loans) (EQAR 2016).
agency to decide whether to publish the full reports; in other words, the national legislation is in contradiction with this expectation set out by the ESG.

A further issue in relation to the use of external QA reports as public communication material is that of comparability. There is a consensus that the purpose of QA is not specifically to allow for comparisons between institutions and systems, and that QA reports should not be used to prepare rankings or league tables. An ENQA study looking at external QA reports found that the structure and content of the reports vary considerably, making it anyway very difficult to draw comparisons (ENQA, 2014). The same study concluded that a common European template for external QA reports was not feasible due to their different purposes and contexts, but instead offered some generic guidelines for improving both summary and full reports. The discussions in the EQUIP project show that these conclusions are still relevant today and worth revisiting so as to improve the usability of the reports.

With regard to the use of external QA results as a communication tool, it is finally worth considering the question of who is the target audience of the report in the first place, which was an issue raised by various stakeholders in the focus groups. The discussions resulted in the conclusion that the reports cannot and indeed should not be everything for everyone. It is unrealistic to expect external QA to answer all questions that might arise regarding the quality of a programme or institution, or for the reports to fulfil all information expectations of all stakeholders (including the public). Trying to achieve this would ultimately make the reports unreadable for everyone.

In terms of the intended audience of external quality assurance reports, the ESG 2015 mentions “academic community, external partners and other interested individuals” (standard 2.6), whereas the previous edition of the ESG did not specify the intended readership in any way. In trying to define the main audience of the reports, the answers from the focus group participants varied greatly and depended on the purpose of quality assurance in their context. To summarise, where the purpose was to provide the public with an assurance of the quality of the education, the target audience was largely defined as external stakeholders (students, their parents, employers, society at large); where it was to serve as a basis for an accreditation decision or similar, the audience was defined as the decision-making body of the QA agency or relevant ministry; and where it was to support the institution itself in improving their work, the audience was
the institution in question or other institutions which can use the reports as a source of inspiration for their own development. An added complexity was that, in most cases, agencies were attempting to cater for at least two, if not all three, of these target audiences.

Even if there are several intended audiences, **QA agencies are recommended to specify who their audiences are so that both the authors and the readers of the report are clear on the intended purpose and readership of the report.**

Having recognised the limitations of external QA reports as a tool for communicating about the quality of an institution’s education provision, it is worth looking at standard 1.8 on public information, which states that “institutions should publish information about their activities, including programmes...”. In relation to the implementation of this standard, three issues for discussion came up in the focus groups, all of which gain more importance with the increased emphasis on external QA at institutional rather than programme level, and on QA needing to demonstrate its worth to policy-makers.

**Box 9: Communicating about QA**

In Switzerland, the communication about QA has been recognised as a challenge and an important responsibility both by the QA agency and the institution.

To highlight this, AAQ dedicated its first Institutional Accreditation Day to this topic under the title “Don’t just do good, but talk about it”. In exploring the links between quality culture and communication culture, the conference provided a platform for institutional representatives to discuss what to communicate, to whom and through what channels (AAQ website).

At the institutional level, the University of Lausanne has placed in every lecture theatre a poster with bullet points explaining why teaching is evaluated and how it is done. This not only acts as a reminder for teaching staff and students of the practical arrangements, but also raises the visibility, accessibility and transparency of QA processes.
First, in cases where external QA reports focus on examining how internal QA systems function, the role of institutions to provide “clear, accurate, objective, up-to-date and readily accessible” information about the programmes for the public becomes even more relevant because the QA agency’s report fulfils that function to a lesser extent. The participants of the focus group for students admitted that external QA reports have never been the primary source of information for prospective students: in fact, a study by ESU indicated that the information provided by institutions themselves (on the website of the institution or the programme) is the most used and most important source of information for prospective students (ESU, 2013, p. 46). Nevertheless, it was pointed out that where external QA is focused at institutional level, cross-referencing the information provided by the institution about its programmes with that of a QA agency will no longer even be an option.

Second, focus group participants noted that the wording of standard 1.8 specifies that institutions should communicate about their activities, but not specifically about the quality of those activities, which seems to be rather more of an implicit expectation. Third, the standard also does not expect institutions to communicate to the public about how they assure or develop the quality of these activities.

This leads to the question of how the public can be confident about the accuracy of the information provided, if it is not informed about how the institution works towards ensuring it delivers what it promises. This is where the external QA report by the agency may play a role. If the role of external QA is to verify the internal QA system of an institution or programme, then the most credible way for an institution to communicate about the effectiveness of its systems would be to refer to its external QA report in the same place as it makes statements about the quality of the education provision.

Regardless of the exact approach, **institutions are recommended to have a clear strategy in place for communicating to the public about their activities and how they are quality assured, including addressing the expectations of ESG standard 1.8.**

The last, but certainly not least important challenge identified regarding communication, deals with internal communication within institutions, which is closely related to the development of quality culture and therefore will be discussed in further detail in the next section.
In its function as a regulatory process, QA inevitably involves a formal side. However, it is widely acknowledged that to be effective, the formal processes need to be accompanied by cultural elements. This is reflected in the ESG 2015, which includes the need to support the development of a quality culture as one of the four principles for QA in the EHEA (ESG 2015, p. 8). Once again, the EQUIP activities showed that fostering quality culture remains high on the agenda in the work of institutions as well as QA agencies. Many of the organisations in the EQUIP partnership have worked on quality culture, and EUA in particular has carried out many projects related to this topic and published the results. In this section, it would not be realistic to try to summarise what has been previously written, but it is worth highlighting some of the key considerations that arose during the EQUIP activities.

The balance between quality culture and bureaucracy is closely linked to the approach to quality assurance that is dominant in the system and institution in question. The definitions of quality identified by Schindler et al. in the research literature (see the introduction to this report) were also recognised by the participants in different focus groups and, in many cases, they could identify elements of all four (purposeful, accountable, exceptional and transformative) in both the internal and external QA systems with which they were familiar.

However, the dominating approach appeared to be purposeful: QA aiming to ensure that the activities and outcomes serve the purpose assigned to them. This is in line with the focus that the ESG puts on fitness-for-purpose in the design of QA systems. For both internal and external QA this requires an inclusive dialogue and common agreement on the aims of the QA system and of the mission of the institution or the higher education system in question. It also requires an ongoing reflective process: as goals and purposes change, so must the QA processes change to keep up with them and remain fit-for-purpose.

The second most recognised approach in the EQUIP focus groups was the accountable approach. In most cases this revolved around institutional accountability to the QA agency, with less focus on accountability to the general public or other external stakeholders. As a result, this approach was also mentioned more in relation to systems and institutions which focused on evaluation against a set of minimum standards, with less emphasis on the enhancement aspects of QA.
In cases where focus groups participants identified their institution or system as taking a transformative approach, the question raised was: what is being transformed? When the concept of seeing quality as transformation was first introduced, it referred primarily to the transformation that students undergo during their studies. This created the link directly to the quality of the education that the students received. However, in the focus groups it was noted that QA systems are, to an increasing extent, geared towards transforming study programmes or institutions as organisations. In other words, the transformation now applies more to the quality of the organisation rather than to the individual.

The approach to quality that was the least commonly seen by focus group participants was the exceptional approach. The concept of excellence was recognised as being far more prevalent when it comes to research, rather than teaching and learning which are often considered to be dependent on the personal characteristics of the teacher and the student, as well as the tradition of teaching being closely linked to the academic freedom of the teacher. Furthermore, many of the focus group participants expressed fundamental reservations about external QA being geared towards identifying and recognising excellence due to the difficulties in defining and measuring excellence in higher education, particularly bearing in mind the increasing emphasis (through the expectations of student-centred learning) on adapting teaching methods to respond to the diverse needs and levels of different students or groups of students. Other reasons for reservations were the potential negative impact on those not labelled as excellent and fears over links being made between excellence and funding.
One common theme for the conversations in the EQUIP focus groups, and of relevance in relation to how QA is perceived, was the gap that exists between theory and reality or in other words between aspiration and implementation. Many of the focus group participants noted that while their institution or system aimed at one type of approach to QA, when put into practice it may take a different direction. This might be because of difficulties in avoiding the inevitable bureaucratic associations that come with administrative processes, the need for at least some minimum standards to ensure a baseline quality, or the increased importance of metrics in some systems that may lead to attempts to focus on certain criteria as a way of “gaming the system”.

The gap between reality and aspiration also has an impact on and comes across clearly in the discussions related to quality culture. The need to foster quality culture in institutions is acknowledged by all parties and outlined in various strategies and institutional QA policies, but in many cases, the practices in place do not reflect this. Whether the external QA approach is compliance or enhancement-led sets the tone for QA processes and has an impact on how an institution approaches this task and what sort of culture develops around it. But beyond the external QA regime, a number of other important factors have been identified as playing an important role in the cultural aspects of QA and for closing the gap between theory and practice.

In a paper presented at the European Quality Assurance Forum in 2013, Vettori & Loukkola (2014) identified three intertwined areas as sources for this perceived mismatch and thus also those to be tackled: ownership, sense-making and communication. The EQUIP focus group discussions confirmed these as being the key areas needing attention in the opinions of all stakeholders.

In terms of ownership, the equation was found to be challenging. On the one hand, the minimum requirements for QA processes are typically defined through a top-down approach, for example through the external QA requirements, which those in charge of QA at the institutional level take as a starting point for their work. However, to foster the commitment of staff and students alike, they should feel ownership for the processes. Discussions with the representatives of academic staff concluded that the best way to ensure ownership is for the staff to be involved in the design of both external and internal QA processes as partners. It was also found that the ESG 2015 facilitate the participation of staff better than the previous version, and this is specifically visible in the formulations of standards 1.1 and 2.2. Some examples of ways to foster ownership are given in Box 10.
In the focus group with staff from professional higher education a further aspect was introduced to the discussion: the role of employers, and how to engage them in QA processes and foster their sense of ownership for QA (one example is provided in Box 11). This discussion naturally reflects the close relationship between professionals in higher education and those in the world-of-work, and correlates with the importance of employability as a purpose of higher education in the same focus group. However, the challenge of engaging world-of-work representatives is also not foreign to other QA actors: the QA agencies reported difficulties in finding working life panel members for their review processes, and obtaining feedback from employers to contribute to programme review was noted as a challenge in the focus group for universities.

Box 10: Fostering ownership and participation in QA processes

At the Vienna University of Economics and Business (WU) in Austria ownership of and responsibility for the quality of programmes is fostered through programme evaluation workshops, which are held every four years for each programme as part of the process for evaluating and developing curricula. The workshops bring together a range of stakeholders including the programme director, the programme quality manager, employer representatives, students, alumni and a director of another programme. The workshops are an opportunity to review recent activities, results and feedback, and discuss ideas for future development, taking into account a variety of perspectives. The results of the workshop feed into a four-year action plan for the further development of the programme.

As part of the development of a new external QA framework in Norway, in 2016 the government published a white paper on quality culture. The preparation of this paper was based on extensive stakeholder consultation and engagement, including the provision of case examples by institutions demonstrating innovative approaches, and a paper published by the Norwegian student union, which fed into the government paper. As a result, there is a high level of ownership of the new system among stakeholders. This work is also laying the ground for a new long-term plan for higher education and research.

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Box 11: Engaging with external stakeholders

The Portalegre Polytechnic (IPP) in Portugal involves employers in its QA system at three different levels: programme planning; programme evaluation and review; and evaluation of the performance of graduates and their readiness for the labour market.

Across these levels a variety of approaches are used. For example, for the process of programme planning, IPP engages with employers through discussion forums, which are supported by the institution's Governing Council. These Forums focus on reviewing proposals for new programmes to ensure that they meet the needs of the labour market, and particularly that they take into account the specific needs of the region in which the institution is based. This is then followed up by involving employer representatives in periodic programme reviews and by sending surveys to employers regarding the performance of graduates.

Box 12: Engaging students in QA

In the Scottish higher education sector, the visibility of the student role in enhancing quality is raised by sparqs (student partnerships in quality Scotland), a publicly funded organisation which works with students, student unions, institutions and other bodies in the Scottish higher education sector to facilitate meaningful student involvement in developing their educational experience. Their work includes offering training, information and events in order to make quality more accessible for students, and giving support to institutions on how to improve student engagement (sparqs website).
The need for QA processes to make sense for staff and students is closely linked to the issue of ownership. Do they know why QA processes are carried out? What are the benefits of QA processes for them, for other stakeholder groups and for the higher education institution? In this respect, for the processes to make sense it is typically not sufficient to refer to macro-level benefits for the institution, but concrete benefits and developments should also be demonstrated at all levels.

For this purpose, the focus groups saw in-depth discussions on how to “close the feedback loop”, i.e. to ensure not only that there are follow-up actions (typically improvements) that come as a result of the QA processes, but also that those actions are communicated clearly to the institutional community. This was an aspect emphasised by the students, but crucially also by the representatives of academic staff, who also feel left out of the final stages of QA processes in cases where they are not responsible for the implementation of a change. Thus, while discussions around QA often focus on motivating students to participate, investing to ensure that the staff are also aware of all steps of a QA process from planning to follow-up, may assist in tackling a similar lack of engagement in QA often perceived among the academic staff.

Indeed, in order to foster ownership and sense-making, both QA agencies and institutions are recommended to examine their processes to see how they engage with their stakeholders, in particular with academic staff and students. This will help to avoid internal and external QA being seen as a bureaucratic exercise that is only of interest to those who have direct managerial or administrative responsibility for it.

On the other hand, academic staff and students are recommended to engage proactively in QA processes and take ownership of their role in improving the quality of education offered by the institution.

The third key factor in fostering quality culture is that of communication. The focus group discussions clearly recognised that when communicating about QA, it is important to use an appropriate language for each target group and to tailor the message accordingly. Quality assurance, as in any other professional field, has its own terminology and this is typically used in exchanges between the QA agency
and the institution, and between those responsible for QA within the institution. However, to promote ownership and sense-making, it is recommended that the quality manager pays attention to their role in adapting the language of the national QA system to that of the institution\(^3\) in order for it to be well aligned with and integrated into the organisational culture. A similar point can be made in relation to student engagement. It was noted during the focus group for students, that student representatives can also find it difficult to talk about QA without resorting to technical language, which may not be understood by the majority of the student population. With this in mind, student representatives (or student unions, where applicable) are recommended to take an active role in explaining the aims, processes and results of QA to their fellow students who are not so familiar with such matters.

For all those with a responsibility for communicating about QA, it is important to bear in mind that not all stakeholders are interested in, or need to know about, all aspects of the QA system. Therefore, consideration should be given to which elements are of importance to which stakeholder group and how that information should be presented. In this regard, too much detail can be just as damaging as too little detail.

### Student-centred learning

The inclusion of a specific standard on student-centred learning (SCL) was the most noticeable and debated change between the ESG 2005 and 2015. It reflects and formalises the ongoing shift of attention towards the role of the student in the learning process and the responsibilities of institutions to review their curriculum design, pedagogical approaches and assessment methods.

As this is a new standard, it is perhaps no surprise that an EQUIP project survey carried out among QA stakeholders showed that defining how to address SCL in QA processes is perceived as a challenge for both internal and external QA by a range of

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\(^3\) A similar point was made by Andrée Sursock in *Examining quality culture: part II*, noting the “interpretative role” as one of many functions of the QA manager or office (p.32).
different actors. When asked to select the most challenging aspects of meeting the expectations of the ESG, the most common responses were “ensuring the link between QA and the academic quality of learning and teaching (design and approval of programmes, and SCL)” and “assessing and measuring the extent to which a programme/an institution has adopted a student-centred approach to teaching and learning”.

However, discussions in the focus groups suggested that it is not only its novelty that causes standard 1.3 to be difficult to implement, but also a lack of a common approach to defining SCL itself and the features that demonstrate its presence or lack thereof.

Responses to a further EQUIP survey to QA agencies suggested that a number of QA agencies had already started to adapt their policies and processes to address SCL before the formal adoption of the ESG 2015, while others were planning to do so in the future. However, participants in the focus group for QA agencies indicated that even when looking at an institution’s or programme’s mechanisms for ensuring that SCL was explicitly mentioned in their criteria, they did not include a concrete definition of SCL. In the discussions, QA agency staff agreed that the starting point should be the institution’s definition of SCL, in line with the principle of institutional responsibility for QA.
In this context, it becomes interesting to note that a large majority of the participants of the focus groups for those responsible for QA in universities and institutions offering professional higher education reported that even when the need for student-centred approaches to learning and teaching was included in their internal policies, they also rarely had a concrete formalised definition of the concept.

While this lack of definition at institutional level evidently creates a challenge, it also reflects the need for SCL to be context-sensitive. A one-size-fits-all approach therefore does not work for SCL (ESU & EI 2010, p. 3) and it is important that institutions implement it in a way that makes sense for their own context and devise corresponding internal QA processes.

The diversity of contexts helps to explain the broad range of responses that focus group participants gave when asked what aspects internal QA should look at when addressing SCL (see Box 13). The responses can be broadly grouped into the following themes: student responsibility for their own learning, teaching methods, pedagogical training of teachers, flexible learning paths, student feedback and feedback to students and even student involvement in governance and decision-making. These aspects chime with those identified in previous studies done on SCL, for example by ESU (2015b, 2010), but also demonstrate what a complex and multi-faceted concept SCL is, with different stakeholders focusing on different aspects depending on their respective contexts. In order to help tackle this, institutions are recommended to engage internal stakeholders to develop a common institutional understanding of SCL, which can then be used to inform QA processes.

With this in mind, it is worth returning to the ESG standard itself, which seems to reflect the definitions found in key European level reports produced in the run-up to the 2015 Bologna ministerial meeting in Yerevan (Gover et al., 2015, p. 16). Standard 1.3 reads that, “Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.” Thus, it identifies the need for students to take responsibility for their own learning, and for an institution and its staff to provide the necessary environment to facilitate this as being at the core of SCL.

At the level of the individual, the provision of feedback to students is a key element contributing to student responsibility. QA processes often focus on collecting feedback
Focus group participants proposed the following aspects to be considered as part of an institutional QA system aiming at ensuring policies and practices for SCL:

**Support for learning**
- Support for students to understand their own learning type
- Frameworks for independent learning
- Sufficient opportunity for students to give and receive feedback

**Support for teachers**
- Pedagogical training, including sharing of good practice
- Supporting use of varied teaching methods
- Sufficient opportunity for giving and receiving feedback
- Supporting use of technology (as a tool, not a goal in itself)
- Recognising good teaching

**Curriculum design and learning paths**
- Ensuring clear descriptions of course content and intended learning outcomes
- Choosing teaching and assessment methods that encourage active learning
- Flexible learning paths and guidance for student choices
- Recognising prior and non-formal learning
- Student involvement in curriculum design
- External stakeholder involvements in curriculum design (e.g. alumni and employers)
- Governance and decision-making
- Genuine student involvement (not just on paper)
- Input from academic staff
- Embedding SCL into university strategy
from different stakeholders, including students; however, during the focus group for students, it was pointed out that this should be a two-way process. Institutions are recommended to pay attention to giving sufficient feedback to students about their work and learning, as this provides important input for them in developing and taking responsibility for their own ability to learn. Similarly, students are recommended to take responsibility for their own learning process, while using the support measures offered by the institution.

More broadly, however, students can play a role in shaping their learning environment and making it fit-for-purpose by participating in the governance structures that bear responsibility for this, and institutions should ensure that there is sufficient and meaningful opportunity for such involvement. In this regard, QA has led the way by advocating for students to be treated as equal partners in the education process and for making student involvement in institutional governance a widespread good practice in the EHEA.

As well as the introduction of the ESG standard on SCL, a corresponding but often less discussed and sometimes overlooked change was also introduced to standard 1.5 on teaching staff. The guidelines of standard 1.5 acknowledge the changing role of and expectations towards teachers and that there is a resulting need for the ongoing development of staff competences to deal with the changing learning landscape.

Data from EUA’s 2015 Trends study show that an increasing number of institutions are indeed investing in staff development schemes, working on new teaching methods and defining learning outcomes for programmes. Preliminary data for the 2018 Trends study (forthcoming) confirms this development. Initiatives for the continuous professional development of teaching staff are also appearing at national and European level (some examples are given in Box 14). To continue this development, public authorities and higher education institutions are recommended to put in place structures and incentives for teaching enhancement. At the same time, it is recommended that academic staff take the time to reflect on their teaching to ensure that their approaches are in line with the principles of SCL.
In line with this recommendation, participants of the focus group for academics noted that placing a high value on sufficient time and opportunity for staff to engage in continuous professional development, including discussion on approaches to SCL, can have multiple benefits beyond the initial aim of developing the competences of individual staff members. Sharing of good practice allows for the multiplication of successful approaches across different faculties and departments, and contributes to the development of a common understanding of SCL across the institution, which is still often missing, as discussed above.
Furthermore, it can also provide an opportunity to foster quality culture through an increased awareness by academic staff about their own role in SCL and its significance for QA, which in turn contributes to their ownership and “sense-making” of QA.

Indeed, SCL serves as a good example of aspects of internal QA that are typically not in the remit of a QA professional or QA unit within an institution. As pointed out by Gover et al. (2015), for an institutional QA system to be fully functional, the participation of different actors within the institution is required. In the case of SCL, for instance, this includes the bodies responsible for curriculum design and centres for teaching support or pedagogical development. Thus, the ESG 2015 call for a more participatory approach to internal QA and as such they provide an opportunity for institutions to promote quality culture, if well utilised.

Lessons learnt and concluding remarks

Quality assurance carried out in compliance with the ESG 2015 is one of the three commitments that characterise the European Higher Education Area (EHEA), alongside the three-cycle degree structure and recognition procedures in line with the Lisbon Recognition Convention (EHEA 2016). According to data held by EQAR in 24 countries there is at least one EQAR-listed agency. In addition, some countries, such as Lichtenstein and Luxembourg, have taken the decision to have their external QA carried out by EQAR-listed agencies from another country meaning that their external QA processes are also carried out in accordance with the ESG.

Overall, the EQUIP activities have demonstrated that more than a decade after the adoption of the initial ESG, stakeholders in the EHEA have a common understanding of QA. Furthermore, while not all actors are familiar with the ESG and differences in perspectives and approaches do exist, many of the challenges in meeting the expectations of the ESG are shared across different countries and stakeholder groups.
Changes in higher education and thus external and internal QA are continuous and are caused by a variety of factors. Therefore, it is difficult to identify which changes are directly due to the introduction of the ESG 2015 and which result from another factor (or most likely, a combination of factors). In most cases, QA and higher education reforms stem from the local and national context, but the ESG are used as a framework that sets certain requirements and boundaries. Beyond the importance of the role of the context in which QA is operating, three overarching themes run through this report.

First, the gap between the theory and aspiration of a QA system and what happens in practice was brought up on various occasions, for example:

- Whereas national strategies may underline all four different purposes of higher education, the steering and funding mechanisms may in practice encourage institutions to focus on one purpose over another (often employability).

- While institutional responsibility for quality and quality assurance is widely recognised, questions about whether and how institutions implement this in practice were raised.

- QA aiming to foster quality culture is mentioned in most QA agency and institutional QA policies, but QA processes are still too often perceived merely as a bureaucratic burden.

- Nearly all institutions provide information about their activities through their websites, but still there seems to be a sentiment among external stakeholders that there is a lack of information.

- And finally, student-centred learning has been on the policy agenda and recognised as a way to take educational quality forward, and yet there seems to be room for improvement in putting this into practice.
It appears that QA still has work to do in bridging these gaps. This leads to the second overarching theme: the definition of QA and its role both at the system as well as at institutional level. Questions were posed about what the expectations towards QA are, how realistic they are and how QA sits in a higher education system or in an institution as an organisation, which is in turn dependent on how quality itself is defined. Lack of clarity over these questions runs the risk for QA to be seen as a panacea for many problems in higher education.

Third, the interplay between the following three fundamental building blocks defines how internal and external QA systems are designed, how the role of QA is defined and how system change is driven:

- The level of trust in society in general, and towards institutions in particular, was identified as an important factor in determining the design of external QA and the degree of guidance given on how institutional QA systems should be arranged. For example, when there is lack of trust, there is an increased likelihood of a more intrusive and prescriptive external QA framework, and vice versa.

- The maturity of (internal or external) QA systems may act as a driver for changes as systems that have been in place for a long time seek ways to remain relevant and fit-for-purpose. Furthermore, long-established systems tend to give less detailed instructions to institutions on how to manage their QA processes, whereas in newer systems the institutions might ask for more guidance.

- The self-confidence of an institution is often linked to the maturity of the internal QA system, as those with more experience grow more confident about their own capacity to manage and design their QA systems and have a deeper evidence base to draw on. This is also in turn often linked to external QA being at institutional level, which is only possible if there is sufficient societal trust towards institutions.
Levels of trust, maturity and self-confidence are inextricably linked and an increase in one area can lead to positive changes in the others, prompting a cycle of continuous development. On the other hand, if all aspects are missing, a vicious circle ensues which is difficult to get out of without long-term systemic changes. In either case, changes to these cycles take place over extended periods of time and cannot be adapted with quick fixes.

On the basis of lessons learnt from the EQUIP activities, and building on previous work done by the partners on quality assurance, three overarching recommendations addressed to those in charge of steering higher education systems, as well as those leading higher education institutions, are formulated:

- Ensure legislation and conditions, including sufficient policies, funding and incentives that provide the necessary framework for high quality education as well as room for innovation and creativity.

- Look at the higher education system or institutional management as a whole. Do not try and do everything with every tool or to make each tool respond to every possible challenge, but consider the synergies between the tools and ensure collaboration between actors in the system or institution in order to increase efficiency.

- Against this background, remember that QA is one tool among others: be clear about its purpose, and design the processes according to the context.
Finally, it is important to remain aware of the risk of carrying out QA just for the sake of it, or developing systems simply to comply with the ESG, rather than for the ultimate goal of improving the teaching, learning, and educational environment in higher education institutions. The recommendations made in this report aim to tackle this risk, and support stakeholders in keeping their internal and external QA systems fit-for-purpose.
Annex 1: Project partners

European Association of Institutions in Higher Education (EURASHE), project coordinator

EURASHE is the European Association of Institutions in Higher Education that offer professionally orientated programmes and are engaged in applied and profession-related research within the Bologna cycles. EURASHE represents universities of applied sciences and university colleges; other members of EURASHE are national and sectorial associations of higher education institutions, and other individual institutions, such as universities. EURASHE members operate within and across different national systems whether these are unitary or binary, professional and/or academic. EURASHE’s mission is to promote, within the EHEA, the interests of professional higher education and of relevant higher education institutions that are recognised or financed by the public authorities of a EHEA member country, either in binary higher education systems or in unitary “university” systems. Its aim is to promote the interests of professional higher education in the EHEA and to contribute to the progressive development of the European Higher Education and Research Area (EHERA).

Education International (EI)

Education International (EI) is the global union federation of teachers, academics and education support personnel. The voice of the teaching profession worldwide, EI represents 32.5 million workers in education institutions from early childhood to university through some 400 affiliated trade unions and professional associations in 177 countries and territories. Based in Brussels, Belgium, EI has been in Special Consultative Status with the United Nations since 1950.

The aims of EI include: to enhance the conditions of work and terms of employment of teachers and education employees, and to promote their professional status in general; to promote the right to education for all individuals world-wide, without discrimination, as well as the political, social and economic conditions that are required for the achievement of equal educational opportunities for all, for the
expansion of public educational services and for the improvement of their quality; and to combat all forms of racism and of bias or discrimination in education and society due to gender, marital status, sexual orientation, age, religion, political opinion, social or economic status or national or ethnic origin, and to promote for all peoples and in all nations peace, democracy, social justice and equality.

**European Association of Quality Assurance in Higher Education (ENQA)**

The European Association for Quality Assurance in Higher Education (ENQA) is an umbrella organisation which represents quality assurance organisations from the EHEA member states. The organisation is composed of 51 quality assurance agencies from 28 countries of the EHEA (members) and 51 organisations with interest in QA from 30 countries around the globe (affiliates).

ENQA’s purposes are essentially threefold: 1) to represent its members at the European level and internationally, especially in political decision-making processes and in co-operation with other stakeholders; 2) to function as a think tank for developing further QA processes and systems; and 3) to function as a communication platform among members and other interested parties and towards stakeholders: public authorities, higher education institutions, students, and QA agencies. ENQA’s activities comprise events, trainings, international QA projects and cooperation with stakeholders. In addition, ENQA coordinates the reviews of agencies against the ESG.

**European Students’ Union (ESU)**

The European Students’ Union (ESU) is the umbrella organisation of 46 National Unions of Students from 39 countries. The aim of ESU is to represent and promote the educational, social, economic and cultural interests of students at the European level towards all relevant bodies and, in particular, to represent the voice of students in Europe by being a consultative member of the Bologna Process. As a diverse, democratic and open-minded organisation, ESU is committed to the development of internationalisation of education, ensuring education is a means for democratic innovation and social inclusion with the focus on the fight against discrimination, improvement of the quality of learning and teaching as well as
implementing a student-centred approach to education, strengthening education as a public responsibility, enhanced by increased public funding and respecting the multiple purposes of higher education. Through its members, ESU represents around 15 million students in Europe.

**European University Association (EUA)**

The European University Association (EUA) represents and supports higher education institutions in 47 countries across the EHEA, providing them with a unique forum to cooperate and keep abreast of the latest trends in higher education and research policies. Members of the Association include about 850 European universities, 34 national associations of rectors and about 40 other organisations active in higher education and research. EUA plays an essential role in shaping tomorrow’s European higher education and research landscape thanks to its unique knowledge of the sector and the diversity of its members. EUA’s mandate in the Bologna Process, its contribution to EU research policy making, and its relations with organisations from across Europe and European institutions, ensure its capacity to debate issues which are crucial for universities in relation to higher education, research and innovation.

**European Quality Assurance Register for Higher Education (EQAR)**

The European Quality Assurance Register for Higher Education (EQAR) was founded by the E4 Group based on a request by European Ministers responsible for higher education at their London summit in 2007. EQAR’s mission is to further the development of the EHEA by enhancing transparency on legitimate and credible quality assurance agencies operating in Europe and by promoting the development of a coherent, flexible external quality assurance system for Europe as a whole. To achieve its mission, EQAR manages a Register of quality assurance agencies operating in substantial compliance with the ESG.

EQAR is managed by its four founding members: ENQA, ESU, EUA and EURASHE. EQAR also includes BUSINESSEUROPE and Education International (EI) as further stakeholder members, as well as 38 European countries, represented by their ministries for higher education as governmental members.
Portuguese Polytechnics Coordinating Council

The Portuguese Polytechnics Coordinating Council (CCISP - Conselho Coordenador dos Institutos Superiores Politécnicos), created in 1979, is the body of joint coordination and representation of public polytechnic higher education (PHE) institutions in Portugal. It comprises all public polytechnics (15 in total) and all public non-integrated schools (five in total). Since traditional universities in Portugal can also encompass polytechnic organic units, some of the public universities that provide polytechnic programmes are also part of CCISP (five in total).

It is CCISP’s mission, in addition to the co-representation of PHE institutions, to collaborate in the creation of national education, science and culture policies, and to give opinions on all issues related to the public PHE system, not only in terms of legislation, but also in terms of budget. Furthermore, the Council also aims to contribute to the development of education, research and culture in general and to the recognition of PHE institutions and their agents, as well as the reinforcement of partnerships with foreign entities.

University of Oslo

The University of Oslo (UiO) was founded in 1811 as the first in Norway. Today it is the country’s largest public institution of research and higher learning. As a classical university with a broad range of academic disciplines, UiO has top research communities in most areas. Moreover, UiO currently has 8 National Centres of Excellence and a strategic focus on interdisciplinary research in the field of energy and life sciences in particular.

The Department of Education, Faculty of Educational Research (IPED) is Norway’s largest department for educational research. The research provided by the Department of Education is focused on some selected research themes managed by several research groups. Among the research priorities of IPED are: Organisation, governance and management of educational institutions; Comparative and International Education; Education and Educational Studies in a historical and philosophical perspective; Higher Education and Work Place Learning; Modern Childhood: Children and youth education; Language Development and text-based learning; ICT and learning.
Annex 2: Project activities

The project “Enhancing Quality through Innovative Policy & Practice” aimed at supporting and promoting a consistent, efficient and innovative embedding of the ESG 2015 at grassroots level. With this objective in mind, the following key activities were carried out during the course of the project between November 2015 and May 2018:

· Publishing and promoting the ESG 2015\(^5\) to the entire higher education community
· Publishing an analytical report\(^6\) highlighting the innovative aspects of the ESG 2015
· Organisation of multi-level peer-learning groups with five training sessions, including webinars:
  o Webinar, 17 February 2016
  o Workshop in Amsterdam, Netherlands, 14-15 March 2016
  o Webinar, 13 April 2016
  o Workshop in Vienna, Austria, 9-10 May 2016
  o Workshop in Lisbon, Portugal, 6-7 June 2016.

· Identifying and promoting innovative ways to apply the ESG 2015 by consulting all higher education actors through surveys and the organisation of focus groups for all stakeholders:
  o Students, Brussels, Belgium, 16-17 February 2017
  o Universities, Vienna, Austria, 2-3 March 2017
  o Lecturers, Brussels, Belgium, 15-16 March 2017
  o Universities of applied sciences/professional higher education, Le Havre, France, 30-31 March 2017
  o Quality assurance agencies, Oslo, Norway, 3-4 May 2017
  o National authorities, Prague, Czech Republic, 19-20 October 2017.

· Publishing this study on implementation challenges, solutions and policy impact
· Putting forward European-level policy recommendations to stakeholder groups to feed into the discussions leading up to the 2018 EHEA Ministerial Conference
· Breakfast event in Brussels, Belgium on 27 February 2018 to launch and discuss the findings of the project
· Webinar on 28 February 2018 to discuss the findings of the project.

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National Forum for the Enhancement of Teaching and Learning website. [https://www.teachingandlearning.ie/](https://www.teachingandlearning.ie/)


Student partnerships in quality Scotland (sparqs) website. https://www.sparqs.ac.uk/index.php


In May 2015, the Bologna Process Ministerial Meeting saw the formal adoption of the revised Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG).

The EQUIP project – Enhancing Quality through Innovative Policy & Practice – was developed as a response to a need for training and dissemination activities after the adoption of the ESG. The purpose of the project is to support and promote a consistent, efficient and innovative embedding of the ESG 2015 at the grass-roots level.

This report discusses the key challenges and areas of debate in implementing quality assurance in line with the ESG 2015 and makes related recommendations to the different stakeholder groups.

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