TWO EUROPEAN RESPONSES TO ASSURE QUALITY IN HIGHER EDUCATION

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Abstract

Looking at the "European Higher Education Area" in terms of their different quality assurance systems one can clearly identify a great diversity. This situation reflects the creativity of all countries to establish a system compatible with their own cultural, economic and social background. This article shall highlight examples of two European countries, Germany and the United Kingdom, and their efforts to develop a comprehensive quality assurance system. A systematic and historical approach of these two nations will be based on literature research, scientific studies and personal experience. The article will provide a general perspective on two different national quality assurance systems as well as their current political discussions drawn from an Austrian perspective. The external view but nonetheless European perspective shall maintain a more objective review and assessment of these countries. Although there are diversified quality assurance systems all over Europe, there is a need and a will to cooperate between this diversity while still keeping the individuality of the own country. Thus, I am interested in the development, the challenges as well as problems of these systems and possible ways for improvement.
Key words: *European Higher Education Area, quality assurance, diversity, comparative research.*

The Rise of Quality Assurance in European Higher Education

Quality was a central concern in Europe since the emergence of universities (Neave, 1994, p. 116) but the reasons for and roots of today's quality assurance procedures primarily date back to the last century. Universities around the world are strongly influenced by two European models: (1) the *German model* which was based on the ideas of Wilhelm von Humboldt with the principals of academic freedom, the unity of teaching and research, the autonomy of institution and the freedom of learning, and (2) the *British model* with a close teacher-student relationship and an emphasis on personality development through liberal education (Gellert, 1993, pp. 237f). However, universities changed over time, lost their monopole position towards a much more diversified higher education system and had to react on massive expansion processes in terms of student numbers and higher education providers (Trow, 1973). Consequently, ministerial control and funding have reached their limits followed by economic depressions in the 1970s and 1980s which led to numerous reforms of the steering mechanisms of European higher education systems. Hence, in the 1980s and 1990s

quality assurance has become as a very important issue in Europe and countries started to create and establish quality assurance systems (Westerheijden et al., 2006, p. 2) to go in line with "the demands of a modernising state" (Neave, 1994, p. 119).

In Europe the first formal national quality assurance policies date back to the mid 1980s with national initiatives in France (1984), in the United Kingdom (1985) and in The Netherlands (1985) mainly because of financial shortcomings. These first quality assurance schemes influenced other European countries and abroad. The starting point for systematic quality assurance at higher education institutions in Europe trace back to an ad hoc working group by the European Union in 1991 and was followed by a pilot EU-project on *Evaluating Quality in Higher Education* in 1994 (Westerheijden et al., 2006, pp. 2f). Diverse external dynamics determined the design of a next generation of quality assurance to gain more transparency and legitimacy in European higher education systems through increased internationalisation. Consequently a *European Network of Quality Assurance Agencies* was established in 2000 to better European cooperation in terms of quality assurance. The network was renamed in 2004 into the *European Association for Quality Assurance in Higher Education* (ENQA). The claim for a *European Quality Assurance Register* for quality assurance bodies arose in the last years to highlight comparable criteria and methodologies. This process is currently on the way and the register already comprises seventeen European quality assurance agencies.

All these initiatives happened within the scope of the *Bologna Declaration of the European Union Ministers of Education* in 1999. The so-called *Bologna Process* created a completely new situation and is the starting point for lots of transformations in Europe. One of the main goals of the *Bologna Process* is to create a *European Higher Education Area* and as one cornerstone to promote European co-operation in quality assurance, stressing the necessary links between quality assurance and recognition and the need for closer co-operation between actors in these two fields at institutional, national and European levels. This process influences national policies, f.e., to establish a structure for quality assurance and accreditation at a European-level. An important project at European level is *the Joint Quality Initiative* (JQI) with several important goals: to collaborate and disseminate good practices in terms of quality assurance and scenarios of mutual evaluation, to accept of different accreditation/certification mechanisms and to establish of a common framework for the Bachelor/Master-structure in the Bologna model. Furthermore, there is a network solely responsible for management studies on higher and further education called the *European Quality Link* (EQUAL) and the *European Quality Improvement System* (EQUIS) which operates in Europe as an accreditation agency. To recognise educational and vocational qualifications at national/European level *National Academic Recognition Centres* (NARIC) and the *European Network of Information Centre* (ENIC) have been founded.

Till the end of the 20th century most of Western European countries have created formal quality assurance systems and established a national quality assurance body but only a small number also included European co-operation in quality assurance. Nowadays quality is an important task at institutional and political agendas of higher education policies but with diversified solutions of each single European country. In this regard I want do emphasis on two European higher education systems that have a long history in higher education Germany and the United Kingdom and a different approach on quality assurance. With the perspective of an Austrian researcher in the field of higher education I will figure out the differences and possible similarities of these two countries.

System Approach: Germany

Germany is the largest country within the European Union concerning the number of inhabitants (about 80 million) and accounts for approximately 20% of the GDP of the EU-25. Germany comprises 16 federal states (*Länder*) which are in charge of their individual higher education system as a principle of sovereignty. The wide range of higher education institutions are governed un-

der the *Framework Act for Higher Education* (*Hochschulrahmengesetz*) and additionally all *Länder* adopted their own acts on higher education (Witte, 2006, p. 135).

As per February 2010, Germany counted nearly two million students with the majority of students enrolled at public institutions (95%) next to small numbers in the church and private sectors. Currently there are 370 state and state-approved higher education institutions with their different profiles: 110 universities, 205 *Fachhochschulen* (universities of applied sciences), and 55 colleges of art and music (HRK, 2010). Higher education is mainly publicly funded through the individual budget system of the *Länder* while some expenditure is also provided by the federal government. As higher education institutions are autonomous and flexible in terms of budgeting they gain more opportunities to deposit accrued reserves and revenues but also need to set up suitable management instruments and new types of reporting. Some *Länder* introduced lump sum budgets and formula-based funding. Therefore, various methods to assess the budget are implemented, such as performance criteria or target agreements (Hartwig, 2004, p. 13). The private higher education sector is primarily financed through private funds but occasionally private projects are also publicly funded as some reform goals are more easily to realise than in the public sector (Pechar, 2001, p. 261).

With the upcoming of a modern bureaucracy the first quality assurance mechanisms developed and they can be found to a large extent till the late 20th century (Neave, 1994, p. 116). Then in the 1970s and 1980s there have already been debates on reforms when the *Science Council* started periodical evaluations to strengthen teaching (Serrano-Velarde, 2008, p. 39). Nonetheless, Brennan et al. (1992, p. 9) stated in a comparative pilot study on economics: "With not much more than appropriate exaggeration it can be said that the comparative quality issue does not exist in higher education in Germany". One can even say that till the 1990s the term *quality assurance* concerning higher education was rarely used in scientific debates. In the political context it was only mentioned because of doubts in the efficiency and effectiveness of higher education performance because politicians were more concerned about a way of unification of higher education than about the quality problem. The main reasons for the absence of quality assurance discussions have been (de Rudder, 1994, p. 204): (1) peer-review procedures for research was already prevailing, (2) universities are not pedagogical institutions and students are responsible for their studying by themselves, and (3) there was a low unemployment rate of graduates as university degrees have been considers as higher than other certificates.

Though, aroused from the pilot study of Brennan et al. (1992) next to in huge expansion of student numbers and a lack of funding and staff (de Rudder 1994, p. 201) the policy on quality assurance changed radically and Germany was forced to take part in the international discussion process on evaluations and quality assurance in higher education. The rise of German quality assurance in higher education is mostly seen in the EU pilot project *Evaluating Quality in Higher Education* (1994) when the *Rector's Conference* (HRK) started to test new evaluating procedures (Serrano-Velarde, 2008, p. 39). Consequently, some states developed evaluations and assessments of higher education performances (de Rudder, 1994, p. 201) which are summarized by Serrano-Velarde (2008, pp. 113f) as three different types of evaluations: internal evaluations systems, evaluations by networks of higher education institutions (*Verbund* agencies) and regional evaluation agencies.

As higher education objectives are in the responsibility of the *Länder*, there is "no single assessment system at national level" (Hartwig, 2004, p. 65) but several different federal solutions have been found. The general basis for all states is that higher education institutions are now responsible for their quality assurance and have to establish their own quality assurance system (Serrano-Velarde, 2008, pp. 63ff). Though, each institution is free to decide on the respective system of internal quality assurance and the instruments and procedures to assure quality in research, teaching and administration by themselves. Only with these systems they have to be accountable which consequently gives them more autonomy (Mittag & Daniel, 2008, p. 281). Starting in 1994 several evaluation agencies have been established until 1998 the *Kultusministerkonferenz* (KMK) decided on a twofold system of quality assurance: evaluation on the one hand and accreditation on the other hand. Therefore, impartially accreditation agencies have been established with a Council consisting

of representatives from the market, the politics and higher education institutions. Accreditation is different to the state approval procedures and shall guarantee minimum standards and check the employability of academic degrees (Serrano-Velarde, 2008, p. 69). At the same time the *Projekt Qualitätssicherung* was established as platform for quality assurance issues which was necessary to coordinate this diversified system. Furthermore, the *Accreditation Council* (*Foundation for the Accreditation of Study Programmes in Germany*, AC) was set up to regulate the different accreditation agencies. On application from the agency, an accreditation process is carried out by the AC that decides on the accreditation or reaccreditation. Hence, each agency itself must be subject to an accreditation process before it is given the authority to award the *Quality Seal of the Foundation for study programmes* to those programmes that have successfully accomplished an accreditation procedure. Currently there are nine accredited agencies which are situated primarily in Germany but there are also one Swiss and one Austrian agency in operation.

Since 2003 programme accreditation is compulsory for all bachelor and master programmes in Germany. Due to critics on the immense time and effort for programme accreditation next to other quality assurance procedures higher education institutions seek for a new way of quality assurance mechanism. Therefore, Germany shifted from programme towards system accreditation to reduce the workload for accreditation as far the accreditation of higher education institutions also includes the accreditation of all study programmes. In 2007 the AC decided on *Criteria for System Accreditation* and *General Rules for Carrying Out System Accreditation Procedures* as basis for a new way of German quality assurance. System accreditation shall accredit the quality assurance system for the development and carrying out of study programmes (Mittag & Daniel, 2008, p. 284). Each institution is now free to decide on the respective system of internal quality assurance and the instruments and procedures to assure quality in research, teaching and administration. Moreover, they can choose between these two types of accreditation and although the 'object' of the review processes differs between programme and institutional level, the new system accreditation has close links to the programme approach (Hopbach, 2009, p. 83).

In summary this complex higher education system has a quite long history of evaluation procedures carried out by different agencies throughout the country. The change towards an approach on accreditation was a start of a more organised system of quality assurance and thereby the AC acts as central organisation within this variety of accreditation agencies. The recently occurred shift towards system accreditation can be seen as final step in a long discussion process but there is still a long way to go.

System Approach: United Kingdom (UK)

The United Kingdom (UK) is divided into four regions, namely Northern Ireland, Scotland, Wales and England – each with a different education system. UK's higher education sector comprises universities, higher education colleges and a few university colleges. These institutions differ a lot in size, mission and history. 80% of the population in the UK is located in England and this is also reflected in the context of higher education: in 2007/08 out of about 2,3 million students approximately 80% are studying and out of 166 higher education providers 80% are located in England (HESA, 2007/08). Most significant for UK higher education was the *Further and Higher Education Act* in 1992 when polytechnic institutions received university status and the funding and evaluation procedures became a new structure (Tavenas, 2004, p. 48).

Universities and Colleges are self-governing and legally independent bodies with a high degree of autonomy, some as higher education corporations and as entities acknowledged by an *Act of Parliament* (QAA, 2005, p. 7). Some steering issues of higher education are organised at regional level while others are kept by state departments of the UK government. The public funding of UK higher education is twofold: the bulk of funds is directed from the four regional *Higher Education*

Funding Councils (HEFCs) and further funding from the *Research Councils*. These councils are regional, independent and non-departmental bodies and in charge of the financial support of all higher education institutions in terms of teaching and research. The money from the HEFCs is given to the institutions as a "block grant" that gives them the freedom to set their own priorities (Leisyte, 2007, p. 37).

The current quality assurance system in the UK has its legislative roots in the late 1980s and early 1990s, a time of massification in student numbers as well as higher education institutions. For that reason more accountability and measurable outputs and outcomes have been inevitable and a shift "from a reliance on the judgement of professional staff delivering the service towards inspectorial-style judgements made by external bodies" (Universities UK, 2008, p. 17) can be seen. Till 1992 there was no (external) quality assurance in the UK except of already existing external assessments of the polytechnics and colleges as well as programme accreditation for those that were eager to be recognised by some professional or statutory body (Brown, 2004, pp. 35/37). Due to internal and external pressures the first step was to establish four UK higher education funding bodies (HEFCs) as recommended in the *White Paper on the Future of Higher Education* in 1991. This paper also differentiated between two types of external quality assurance mechanisms (Universities UK, 2008, p. 17):

- *Quality audit* – external scrutiny aimed at providing guarantees that institutions have suitable quality control mechanisms in place; within the responsibility of a unit owned by higher education institutions; and
- *Quality assessment* – the external review of, and judgments about, the quality of teaching and learning in institutions; within the responsibility of the funding councils.

Starting with the *Further and Higher Education Act* of 1992 the HEFCs monitored the quality of their funded academic programmes and therefore established the *Higher Education Quality Council* (HEQC) which was accountable for (1) auditing the effectiveness of institutions' quality assurance arrangements, (2) promoting quality enhancement, (3) co-ordinating sector-wide networks, and (4) organising good practice forums (Leisyte, 2007, p. 53). For the next years the funding councils created quality assessment committees to assess the quality of their funded sectors (teaching quality assessment, TQA) and these procedures were completed in Scotland and Wales in 1997 and four years later also in England and Northern Ireland (Universities UK, 2008, pp. 17f).

In terms of quality assessment of research the UK established the *Research Assessment Exercise* (RAE) in 1986 as the first "explicit and formalised assessment process of the quality of research" and as a "discipline-based expert review process" of peers (RAE, 2010). Starting in 1992 the HFCEs based their funds on the performance identified by the RAE within an expert review by discipline-based panels. The last exercise dates back to RAE 2008 which was a highly selective procedure and made judgements according to a graded profile. Nevertheless, the RAE will be reformed and a new system will maybe replace the peer review based assessment exercise: metrics that are based on qualitative measures shall simplify the assessment procedure and avoid unintended effects of the RAE (Leisyte, 2007, pp. 55f).

Due to blurred boundaries between quality assessment and academic audit as well as increased bureaucracy the *Quality Assurance Agency for Higher Education* (QAA) has been created by the state in 1997. HEQC and the quality assessment divisions have been absorbed by the QAA and consequently two separate external processes became one single mechanism (Universities UK, 2008, p. 18). At the beginning QAA was responsible for periodical institutional and programme evaluations but these expensive and complicated procedures did not have a great impact as only 0,2% of all evaluations have been negative (Tavenas, 2004, p. 48). After a consolidation phase of this new agency a shift from accountability towards quality enhancement was visible (Williams 2009, p. 1) because it also gives advises on possible improvements. Thus, QAA changed their procedures to "institutional audits" with evaluations of internal quality evaluation and management procedures while the decision on programme evaluations have only been conducted if any problems have been detected (Tavenas, 2004, p. 48). This was the end of subject reviews and the gathering of all reviews on institutional and subject levels because they were assessed as part of an institutional audit with

the focus on quality enhancement. This new method of institutional audit was first implemented in Scotland and later in England, Northern Ireland and Wales from 2001 till 2002 (Leisyte, 2007, p. 53). Furthermore, the national QAA created an assessment process for teaching quality as well as *Frameworks for higher education qualifications* and subject benchmark statements for numerous academic fields of study. In summary, as UK's higher education institutions are responsible for academic standards and quality by themselves whereas QAA only has to check "how well they meet their responsibilities, identifying good practice and making recommendations for improvement" and to publish "guidelines to help institutions develop effective systems to ensure students have high quality experiences" (QAA, 2009, p. 1ff).

England, Northern Ireland, Scotland and Wales show different approaches on quality assurance but in total all systems are quite similar, especially the systems of England, Northern Ireland and Wales (Universities UK, 2008, p. 21). Thus, the UK system is characterised by a strong focus on quality assurance in terms of higher education research (RAE), although this highly elaborated system has to be reformed and more simplified. The UK system also changed towards quality improvement rather than the previous strong emphasis on accountability. Only one national quality assurance agency is in charge of all procedures within this national system. Moreover, the new approach of institutional audits shall help to reach a high level of quality in higher education in the UK. It can be stated that the prevailing quality assurance system changed from a "more inspection-based model" towards a "culture of continuous improvement and enhancement" of higher education institutions that handle their own quality and standards in an effective manner (ibid., p. 3). Currently there are numerous uncertainties in terms of quality assurance in higher education in the UK but "there should be no need to fear the future", Peter Williams (2009, pp. 1f) argues.

An External Perspective

The growing interest for quality in higher education is closely linked to expansion processes with increased costs and a change of the traditional role of the government. The examples of Germany and the UK illustrate two different approaches in their individual economic, cultural and social contexts. In the following I address the differences and similarities of both higher education and what future perspectives can be figured out. I built on the insights from the two system approaches and on already existing comparative studies. Both countries have undergone fundamental reforms in terms of governance, funding and, of course, in terms of quality assurance. They have been confronted with elementary shifts in their higher education system and had to change their attitude in academic affairs. Germany and the UK look back on a long history of higher education but their concentration on quality issues is rather young and still under development. In the UK the first steps towards a quality assurance system started mainly in the 1980s and in Germany a decade later. However, both countries put quality assurance on the top of their political agendas and institutionalised respective mechanisms by the end of the last century.

The UK has taken two fundamental initiatives to assure their quality in higher education: (1) *Research Assessment Exercise* to evaluate the quality of research and (2) *Academic Audit* process to assess quality assurance processes in all academic institutions. Primarily responsible for these efforts in UK quality assurance have been financial measures, such as performance-based state funding. The hallmark for German higher education system is the competition between various quality assurance agencies within the country. The highly diversified German higher education system has a quite long history of evaluation procedures carried out by different agencies throughout the country. Thus, the German quality assurance system is much more organised since the change towards accreditation and finally the upcoming of system accreditation. The growing interest on institutional quality audits and a decline in invasive, discipline-based quality assessments are also found in other European countries and abroad.

The main predominant cornerstone that highlights the differences between these two systems is their governance model: the UK is traditionally based on the "Anglo-Saxon governance model"

while Germany is based on the "Continental model" (Clark, 1983). The role of their governments opened up because more opportunities for creative solutions are given to the higher education institutions themselves. The UK shifted their governance from a more liberal orientation towards a stronger state regulation which affected funding as well as quality assurance matters. This happened in line with increased accountability, efficiency and a loss of trust towards higher education institutions from the state. Germany went the opposite way from a previous strong state control towards deregulation and more university autonomy. Aspects of accountability, such as performance-based funding and reporting, reached German higher education policies rather late. On the one hand these transformations led to a new way of university management and both countries integrated a business-like behaviour in higher education matters. On the other hand it resulted in the establishment of various different organisations: the HEFCs and QAA in the UK and the AC as well as lots of further quality assurance agencies in Germany. Concerning funding the UK went a quite strong way with their periodic RAEs while Germany has changed to performance-based funding next to lump-sum budgets which are not directly linked to quality assurance mechanisms.

Nevertheless, Europe needs to develop a system concerning both the qualification of formal knowledge, as well as the knowledge of quality. Furthermore, the most important conclusion is that the international pre-conditions for improving recognition across the *European Higher Education Area* have been created. Although there is no European or EU model of quality assurance the closest form is set up in the *Bologna Declaration*. With the goal of a development of comparable criteria and methodologies in terms of quality assurance Europe is on the road towards a common European understanding of quality, which, while it does not yet contemplate the establishment of a supervening *European Quality Assurance Agency*, does encourage collaboration between national agencies on a European and regional basis (Farrington, 2005, p. 53). Also Germany and the UK are integrated in the international discussion processes and are involved in the work of European Networks (members of various quality assurance networks).

Looking at these country reports concerning their quality assurance procedures tremendous differences but also some similar approaches have been figured out. Both countries have taken great initiatives to assure their quality in higher education and their procedures reflect their cultural and historical background. Their quality assurance systems cannot be exchangeable or some approaches can be applied by another country. From an Austrian perspective – without going to much in depth of both systems – I would argue that both countries similar to other European countries try to shift towards a more comprehensive approach. System accreditation in Germany or institutional audits in the UK shall be the future procedures instead of the previous piecemeal mechanisms with a high degree of bureaucracy and burden of work for higher education institutions. Nevertheless the next years will show if these two approaches will be a functioning alternative within the high complexity of quality assurance mechanisms in Europe and abroad.

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