



26. March 2001

**To the participants in the Salamanca Conference.**

The steering group of the European Network for Quality Assurance (ENQA) has been following closely the process of follow up on the Bologna Declaration. Several members participated in the closing validation seminar of the CRE project on accreditation 8-10 February 2001 in Lisbon and will join the Salamanca Convention of European Higher Education Institutions 29-30 March 2001.

Within the framework of the preparations for the meeting of the Ministers May in Prague the steering group has drafted a position paper on European quality assurance and the Bologna follow-up.

The position paper is enclosed and it is the expectation of the steering group that the perspectives raised in the paper will prove relevant in the context of the discussions in Salamanca.

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Chairman of the Steering Group

**FOLLOW UP ON THE BOLOGNA DECLARATION:  
A EUROPEAN QUALITY ASSURANCE SYSTEM.\***

The European Network for Quality Assurance in Higher Education (ENQA) was formally established in 1999 on the basis of the recommendation on Quality in Higher Education adopted by the Council of Ministers on 24 September 1998. This recommendation encourages the further introduction of quality assurance methods in higher education and the promotion of European cooperation in this field. It recommends to the Member States that they establish transparent quality assessment and quality assurance systems, which should be based on a number of common principles. These principles were established in the earlier European pilot projects 1994-95.

The membership of ENQA is open to quality assurance agencies of the European Union, public authorities responsible for higher education and European associations of higher education institutions. ENQA also includes representation from the CEE countries.

The steering group of ENQA has been following closely the European debate following upon the Bologna Declaration of June 1999. The Declaration calls, amongst other things, for the promotion of European cooperation in quality assurance with a view to developing comparable criteria and methodologies.

On this point the Declaration accordingly parallels closely the Council Recommendation of November 1998. The recommendation focuses exactly on the need for member states to face the task of organising their higher education systems in ways that respect existing academic standards, training objectives, and quality standards. Further, the recommendation stresses that transparent educational systems are required for transnational mobility.

This mandate has been closely followed by ENQA, building on the fact that the basis for the work of the network is the already existing level of cooperation and harmonization of practices among the existing agencies for quality assurance. The broad objectives of the network are accordingly being implemented through initiatives such as the following:

- The support, development and improvement of the work of the agencies in charge of external quality assessment by exchanges of experience between the quality assurance agencies and the discussion of practical questions

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\* This memo on a European quality assurance system as part of the Bologna follow up process is the responsibility of the steering group of ENQA. The memo will be presented to the general assembly of ENQA at its meeting in 22-23 May 2001.

- The promotion of co-operation in shaping a trans-national, European dimension to quality assurance, i.e. by introducing a European perspective in the staff development of QA-agencies.
- The promotion of contacts and dissemination of experience with other actors such as public authorities, higher education institutions, and students
- The promotion of discussion on follow-up procedures to quality evaluations.
- The provision of assistance to authorities and institutions wishing to introduce quality assurance by providing expertise and advice on how to introduce quality assurance mechanisms and how to set up a quality assurance system
- The focus on the relations between quality assurance and other issues of higher education policy mentioned in the Recommendation, such as academic and professional recognition and accreditation
- The development of quality assurance instruments for new modes of delivery such as open and distance learning.

It follows that ENQA is well into the process of making the network a viable framework for providing answers and solutions to issues such as those raised by the Bologna Declaration.

ENQA's steering group is convinced that the basic premise for a European quality assurance dimension is the existence of well-established and effective national systems of quality assurance – so long as higher education is primarily funded and legally regulated on a national basis. However, the steering group also recognises that the national systems have, as a general rule, developed their procedures and methodologies with a focus on their own national educational arrangements. The steering group is fully aware that new developments challenge the purely national context for quality assurance.

The need for change is to a large extent related to internationalisation. Among the international changes affecting higher education are a growing international market for higher education, transnational education and a need for recognition of degrees due to graduate mobility. The Bologna Declaration can be viewed as a European response to these developments.

The exact extent to which these new developments are already present at a substantial level is, in the opinion of the steering group, a subject for discussion. However, there is no doubt that European higher education institutions do perceive themselves as confronted by new challenges that demand new solutions, preferably at a European level. One prominent example of this development is the project launched in 2000 by The Association of European Universities (CRE), with the aim of exploring the context and the feasibility of accreditation as a European solution to the challenges of internationalisation generally and the framework of the Bologna Declaration specifically.\*

In accordance with the aims of the CRE project, the preparations for and discussions at the closing Lisbon seminar focused primarily on using the concept of accreditation as the building stone

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\* The steering group of ENQA has been associated with this project in its later stages and was represented at the final workshop in Brussels and at the closing conference in Lisbon.

for various particular proposals. However, the seminar also concluded that accreditation should not be viewed as an end itself but rather as one of a number of possible components in a European approach to quality assurance. The steering group of ENQA agrees that accreditation raises more questions in a European context than it answers, while nonetheless recognising its use as a possible element in a general quality assurance system. The defining characteristic of accreditation is that the process is based on established standards/criteria and that the result of the process is a decision - 'yes' or 'no' - as to whether these standards have in fact been met by the institution or programme under accreditation. Whether labelled accreditation or something different, the important thing is that the method used is based on agreed and published standards and makes a formal codified statement about whether or not the evaluated object meets these standards.

But however defined, in a European context an accreditation process should not differ in methodological principle from the evaluation procedures generally applied already by the European agencies. In terms of basic methodology the European platform already exists as a consequence of ever-closer cooperation during the last decade among European agencies and governments.

One major result of the European Pilot Projects was precisely the identification of features common to the existing European quality assurance systems. The Council Recommendation of September 1998 lists in an annex these indicative features of quality assurance in the following way:

The features referred to below are common to existing European quality assurance systems. The European pilot projects assessing the quality of higher education have demonstrated that all parties involved in this area can benefit from observing these features.

The autonomy and/or independence, in terms of the relevant structures in each Member State, of the body responsible for quality assurance (as regards procedures and methods) is likely to contribute to the effectiveness of quality assurance procedures and the acceptance of their results.

Quality assurance criteria are closely linked to the aims assigned to each institution in relation to the needs of society and of the labour market; the different quality assurance procedures must therefore include allowance for the specific nature of the institution. Knowledge of the institution's objectives be it at the level of the whole institution, at the level of a department or at the level of a single unit, is essential in this respect.

Quality assurance procedures should generally consist of an internal, self-examination component and an external component based on appraisal by external experts.

The internal element of self-examination should aim to involve all the relevant players, especially teaching staff and, where appropriate, administrators in charge of academic and professional guidance, as well as students. The external element should be a process of cooperation, consultation and advice between independent experts from outside and players from within the institution.

In the light of the objectives and criteria used in the quality assurance procedure

and with reference to the structures of higher education in the Member States, professional associations, social partners and alumni could be included in the expert groups.

The participation of foreign experts in the procedures would be desirable in order to encourage exchange of experience acquired in other countries.

Reports on quality assurance procedures and their outcome should be published in a form appropriate to each Member State and should provide a source of good reference material for partners and for the general public.

### Issues and problems of a European quality assurance system.

The steering group of ENQA agrees that it is now the relevant time to look more closely at why and how an accreditation perspective might usefully be applied to the existing framework for evaluation and quality assurance.

One overriding issue is that of securing a European dimension in the future process. During recent months there has been substantial focus on the need for some kind of European organisation to provide a framework for the coming discussions and decisions.

ENQA itself constitutes a framework, established by the European Commission and based on a recommendation by the Council of Ministers. This framework for quality assurance in European higher education is already in place and working. The CRE project concludes with a recommendation to set up a “European Platform” of the higher education institutions, involving also students, quality assurance and accreditation agencies and networks, professional organisations, recognition centres as well as national and regional higher education authorities.

The steering group agrees that further analysis is necessary and that pilot projects may be useful tools, as they have been before in this context. The steering group has a positive attitude towards sharing a platform with higher education institutions, student organisations and other stakeholders, if the purpose of this platform is to investigate the possibilities of identifying common goals, procedures and methodologies.

However, the steering group recommends that great care be taken in the composition of such a platform. On the one hand, it is doubtful whether a very diversified platform composed of members with divergent basic interests could realistically be expected to proceed towards more operational solutions, including pilot projects. On the other hand, the steering group does not believe that a platform should be the responsibility of only one of the participants, so that there can be no reason to distrust the credibility of the outcome from the start.

At the same time the steering group wishes to point out that a pan-European solution may not be the only or most effective answer. In some cases a more limited, possibly regional, organisation could be at least as relevant. The Nordic quality assurance agencies have joined together in a mutual project on the relevance of accreditation in the context of their higher education culture. The Dutch and Flemish ministers of education have taken a similar, but more ambitious initiative. Other countries may be planning to organise themselves in smaller groups for further analysis and recognition of problems connected with the accreditation issue.

The steering group recognizes several important factors and problem areas in terms of identifying what directions a European quality assurance approach could take. The overall issue is, of course, which quality assurance problems could be solved by such an approach and at what costs, and what problems would not be solved.

For the coming discussions the steering group recommends the following aspects as deserving special notice:

1. The relevance of establishing a European context for the mutual recognition of quality assurance systems.
2. The need of governments for credible quality assurance of higher education.
3. The relationship and priority between accreditation of institutions and of programmes
4. The relevance of a comprehensive system for the university as well as the non-university sector
5. The responsibility for establishing criteria, standards and benchmarks with a European dimension.
6. The international dimension of national quality systems
7. How to validate evaluation/accreditation procedures (meta-accreditation)
8. The risk of new bureaucratic and costly constructions with too little value added
9. The problem of making a European quality assurance dimension sufficiently comprehensive so that it provides real consumer protection for students and employers.

Other problems could be listed. There seems to be among some European higher education institutions uncertainty as to whether accreditation should first and foremost work as a promotional instrument towards establishing institutional merits with a view towards the international higher education market. However, an accreditation system with the purpose of promoting European higher education is not necessarily compatible with a system that has the intention of providing transparency and consumer protection.

Any discussion of these matters must take into consideration the fact that some actors are already very active in the field of accreditation. Both US-based accrediting organisations and European associations are increasingly positioning themselves in a growing European market for accreditation. To ignore this and do nothing might be the same thing as encouraging an uncoordinated and confusing proliferation of agencies.

The steering group strongly supports the point that it must be a common European task to identify the less credible accreditation agencies being established. It would be a natural task for ENQA, which has already set up criteria for agencies that apply for membership of the network. But the steering group recognizes at the same time the need to share such an effort with other stakeholders. Mutual recognition of quality assurance systems could be a sufficient or at least important step. Accordingly one of the important issues for future discussion should be the extent to which a European platform could function as a meta-accreditation agency in the same manner as the US Council for Higher Education Accreditation functions as an accreditor of US

agencies. The problem in this context is the potential conflict between national legislation and meta-accreditation judgements. However, it should be a minimum requirement that foreign providers of accreditation accept the national rules.

The steering group is convinced that an eventual new European platform or accreditation organisation should not for the time being have ambitions above those of a meta-accrediting agency. Any mandate for direct accreditation would be highly problematic in terms of existing national priorities and procedures.

### Concluding remarks

The steering group recognizes that the accreditation issue is now part of the European quality assurance agenda. Even if the European governments and quality assurance agencies do not establish systems of accreditation it is nevertheless very likely that accreditation will have some future role to play as a part of the European quality assurance scene. Non-governmental accreditation programs have already been established in Europe and accreditation agencies based in the United States are also active here. But the steering group wishes to emphasise that any more general approach towards accreditation in Europe should be an integrated development from existing quality assurance structures and should not be an additional obligation for institutions of higher education. It is on this basis that the steering group supports the initialisation of a common European framework for quality assurance to look into the possibilities for accreditation.

Whatever the importance of internationalisation it is not possible to create a European accreditation framework overnight. The number of issues raised above clearly illustrates that. There are many problems to solve before such a system could come into operation. Nor is it possible to consider a European accreditation framework without taking into account the national dimension of higher education. National governments are still dominant in terms of regulation and finance and they are unlikely to give away their competence in relation to quality assurance in the foreseeable future.

From the perspective of the steering group, the relevance of close cooperation between national agencies and governments, in strengthening already existing sharing of best practices and building up of joint methodologies, must not be underestimated.

However, it will be the recommendation of the steering group to the General Assembly of ENQA that the Network moves forward in cooperation with higher education institutions, students and other stakeholders in order to secure best practices and relevant organisational forms for the follow up to the Bologna Declaration.