

I.o Introduction

This publication is devoted to six topics related to external quality assurance, and primarily to the *audit*. The term *audit* is used only in a minority of countries and by a minority of quality assurance agencies, and in English-speaking countries it has even taken on negative connotations. For this reason it will be italicised throughout Part I of the publication. With the original sense of the word “audire” – ‘to listen’ – in mind, its use seems justified.

The texts in this volume are organised around six topics. Guiding questions were used to outline the single chapters.

The first topic is related to questions regarding terminology, purpose and aim. It is devoted to an agency’s definition of an *audit* and the general understanding of an *audit* in the respective country.

- What function does the *audit* have, and what are its central aims?
- Is there an official definition for the *audit* in the country?
- How is it distinguished from other quality assurance procedures (e.g. accreditation)?

The second topic deals with national legislation. It examines the legal requirements for the development and implementation of internal quality management at higher education institutions in the context of an institution’s autonomy, the relevance of the *audit* in the governance of higher education in a country and its relationship with other external quality assurance procedures, as well as the ‘history’ of the *audit*, such as its function in the national higher education system, reasons for its introduction, recent changes etc.

- To what extent are higher education institutions in the country obliged to set up an internal quality system? Are there any legal requirements for its organisation and coverage? Is there an organisation or agency in place to support the institutions in the set up and/or development of their internal quality management?
- Which external quality assurance procedures other than the *audit* are in place? Which of these are voluntary, and which are stipulated by law? How is the *audit* linked to other procedures?
- What consequences can the result of an *audit* have for an institution?
- How does the agency make sure it does not violate the institution’s autonomy when conducting external quality assurance procedures?

- When were external quality assurance procedures introduced and for what reasons?
- Is the agency obliged to undergo regular external review?

The third topic is the scope, subject and standards of the *audit*. It covers issues related to the Bologna Process in the *audit* model (learning outcomes, the European Credit Transfer and Accumulation System (ECTS), recognition, national qualification frameworks, mobility, third cycle programmes, joint degrees, the social dimension, the global dimension, etc.), the way the *audit* refers to the European Standards and Guidelines for Quality Assurance in Higher Education Part 1 (ESG 1), the definition of *audit* standards and the measurement of the effectiveness of an institution's internal quality management.

- Are there pre-defined standards, and how are they defined? How does the *audit* refer to European developments and principles (e.g. ESG or the Bologna principles)? Do the standards reflect a minimum level of acceptable performance from an institution and/or a certain national threshold or international benchmarks?
- What is the thematic scope of the *audit*? Is the scope of the *audit* defined by law? Can an institution choose part of an *audit's* scope itself or does the agency adapt the scope of the *audit* to the specific profile of an institution?
- How does the agency determine the degree of compliance with the standards?
- How does the agency measure not only the organisation but also the effectiveness of an institution's quality management system?

The fourth topic in the publication tackles the *audit* procedure, in order to learn about the typical stages in an *audit*, and the set-up and preparation of an *audit* panel.

- Which supportive measures can the agency offer an institution ahead of the *audit* and during the procedure?
- How many site visits does the agency conduct together with the panel? How are these organised?
- What kind of follow-up activities does the agency have in place? Which of these are mandatory (stipulated by law), which are requested by the institution, and which are offered by the agency?

- Who participates in the panel and how are panel members selected? Does the agency bring together panels for training and further assignments or organise them separately for each individual procedure?

The fifth topic looks at the question of external assessment and the effects and impact of an *audit*, the impact of the *audit* on higher education institutions and evaluating an agency's *audit*, its reasons and results.

- Does the agency evaluate the impact the *audit* has on an institution and if so, how is it done? Does the agency carry out systematic evaluations of its *auditing* on different levels (organisation, students, academia, higher education policy, etc.) and in different ways (summaries of main findings, publication of summary reports, etc.) and if so, how is the information used?
- Do institutions appreciate an agency's 'care' for them after the official end of the *audit*?

The sixth and final topic addresses current and future challenges and developments. Developments in higher education and in quality assurance are interdependent. But developments and challenges on a national level do not always coincide with those on a European level. Whilst the Bucharest Communiqué for the Bologna Process calls for cross-border activities in the European Higher Education Area (EHEA), national legislation still exists which states this is optional – the issue of internationalisation is one of the challenges agencies face.

- What, in the agency's view, are the main challenges of the *audit*?
- What tasks might await the agency in the future?
- What developments does the agency anticipate for external quality assurance in the country and in the EHEA?

1.1 Terminology, purpose and aim of the *audit*

In general, an *audit* is understood to be the evaluation of a project, a system, a process, a product, an institution or organisation etc. in any context, including industry, public administration, health care etc., and therefore not necessarily related to higher education. *Audits* are frequently associated with examinations to verify the compliance of the accounting methods used in financial statements.

In the European discourse on quality assurance in higher education, however, an *audit* “is a process for checking that procedures are in place to assure quality, integrity or standards of provision and outcomes”¹.

The authors of the European Association for Quality Assurance in Higher Education (ENQA) Occasional Paper 14 give an even more precise definition: “An audit is an evaluation of the strengths and weaknesses of the quality mechanisms established by an institution itself to continuously monitor and improve the activities and services of either a subject, a programme, the whole institution or a theme”.²

The term *audit* is actually only employed in a few countries (Finland, Switzerland and Austria), whereas other agencies and/or countries use a variety of terms. In the United Kingdom the term “audit” has even become maligned and is no longer used by quality assurance agencies. Within the network, the agencies participating in the QAN have agreed to use *audit* as a common working term. However, this does not exclude discussion about the appropriateness of the term as a common denominator.

At least three common characteristics of *audit* procedures can be identified in the different national contexts within the QAN:

a. focus on institutional quality assurance

The procedures have an explicit focus on measures and/or processes set by higher education institutions with the purpose of assuring and developing quality in teaching and learning, and (in some cases) in research and development. *Audits* are to be distinguished from institutional reviews, which go beyond internal quality assurance and refer more to criteria related to the things offered by institutions, such as study programmes, research, infrastructure and resources.

The scope of *audits* in the various countries is described in Chapter I.3.

1 See: <http://www.qualityresearchinternational.com/glossary/>, 22.01.2014

2 Nathalie Costes, Fiona Corzier, Peter Cullen et. al. (2008): Quality Procedures in the European Higher Education Area and Beyond – Second ENQA Survey. ENQA, Helsinki.

b. enhancement orientation

Audits claim to support quality enhancement in higher education institutions. Unlike accreditation, they do not primarily verify the achievement of (minimum) standards with regard to the formal recognition of a (new) study programme or institution, but instead demonstrate the capacity of an (existing) institution to assure (and develop) its own quality.

Although the enhancement function of external and independent quality assurance procedures may be seen to conflict with the function of accountability, *audit* models claim to combine the two.

c. evidence through samples

Audits demand evidence of the existence of internal quality assurance, which is generally provided through samples, such as ‘audit targets’, ‘selected themes’, ‘fields of performance’, or ‘exemplary study programmes’. These samples are intended to demonstrate the performance of internal quality assurance and are reviewed in more detail.

The country and agency reports in Part II of this publication show the variety of terms that are actually used for *audits*: Spain applies an ‘institutional evaluation of quality’ as a part of its external quality assurance, with the assessment of study programmes at its core. The evaluation is expected to provide “guidance to institutions in designing their own internal quality assurance system and to implement an evaluation system that leads to the recognition of their own design”.

The German model was developed as part of the national accreditation system. If a higher education institution has an internal quality assurance system in place, it may opt for a single ‘system accreditation’ instead of requiring accreditation for all its programmes. The “structure and the processes relevant for teaching and learning” are subject to system accreditation, and must achieve the qualification objectives and ensure the high quality of study programmes in a manner that complies with the criteria set by the Accreditation Council, the ESG and the federal states’ structural guidelines.

Finnish *audits* assess “if the quality system is fit for purpose and complies with agreed criteria”. The audit “focuses on procedures to maintain and develop the quality of its operations”.

Norway applies an “evaluation of the institution’s quality assurance system for education”.

The supportive aspect of the *audit* is very explicit in the Swiss and Scottish models. The Swiss *audit* “describes the current state of the quality measures” and should be “part of a process of reflection to assist the higher education institution”. Similarly, QAA Scotland applies “enhancement-led institutional reviews” as one element of its “quality enhancement framework”.

The Austrian model aims to integrate the two functions of “proving that the higher education institution has implemented a quality management system in line with legal rules” and “supporting the higher education institution in the further development of this system”.

A slightly atypical concept is used in Romania, where the “institutional evaluation of quality” consists of a “multi-criteria examination of educational quality”.

Due to occasional confusion with financial *auditing* and investigative approaches, the Quality Assurance Agency for Higher Education in England, Wales and Northern Ireland (QAA) decided to replace the term ‘*audit*’. QAA’s reviews focus on the procedures that the higher education institution uses to set and to maintain its threshold academic standards, and to develop the quality of its learning opportunities.

1.2 National legislation

Following the principle of subsidiarity in Europe, the organisation of education systems is the formal responsibility of national states. Quality assurance schemes in higher education must therefore be understood in their national contexts. The Bologna Process, however, has led to convergence in higher education policies.

An increase in the institutional autonomy of higher education institutions is a common feature of higher education in Europe. Autonomy may be provided in different ways, such as academic self-governance or control over resources. The ESG encourage an increase in autonomy by stating that “the primary responsibility for quality assurance in higher education lies with each institution itself and this provides the basis for real accountability of the academic system within the national quality framework”. The ESG provide guidelines for internal quality assurance inside higher education institutions (Part 1) and state that external quality assurance “should take

into account the effectiveness of the internal quality assurance processes” (Part 2)³.

In most European countries, higher education institutions are required by law to develop internal quality assurance policies and mechanisms. *Audits* focus specifically on this obligation, whilst accreditation and other procedures also generally refer to this requirement.

In several countries *audits* were developed within a tradition of external accreditation. The (positive) result of an *audit* may give higher education institutions more autonomy in their provision of study programmes: in Norway and Germany, the higher education institution receives ‘self-accrediting rights’ once it has undergone an *audit*. These rights may, however, differ between different categories of higher education institution and also from country to country.

Similarly, following the recent reform in Denmark, higher education institutions may receive the right to establish new programmes and to modify existing programmes themselves, depending on the results of the *audit*. In Catalonia/Spain higher education institutions are allowed to modify their study programmes if the changes are not substantial and if they are subject to internal quality assurance.

In other systems *audits* have a different role, as they form part of the state governance of higher education institutions. In the UK system, subscribing to QAA and participating in its review (or *audit*) procedures is a condition for higher education providers receiving public funds. It is also a precondition for receiving degree-awarding powers.

The Swiss *audit* is a prerequisite for receiving federal subsidies, and the higher education institution may even lose some of its federal funding if it fails an *audit*. However, in practice, “the State Secretariat would decree a second audit within twelve months”. Austrian public universities are required to undergo an *audit* as part of their performance agreement with the state, which provides the basis for their federal funding. Universities of applied sciences may even lose their ‘licence’ when they repeatedly fail an *audit*.

In all the countries/agencies, *audits* were often developed in cooperation with higher education institutions. They were introduced into national systems progressively, whilst retaining the aim to support higher education

3 ENQA, EUA, EURASHE and ESU (3, 2009): Standards and Guidelines for Quality Assurance in the European Higher Education Area. ENQA, Helsinki.

institutions in their autonomy and to minimise the burden of external quality assurance. In this spirit, the Spanish system envisages *audits* as an add-on to existing recognition schemes. Scotland offers a variety of measures that support the concept of ‘enhancement-led *audits*’. In Finland, *audits*, which were once voluntary, were made obligatory for higher education institutions. Their task is to provide a qualitative dimension that complements the qualitative assessment by the Ministry of Education and Culture.

1.3 Scope of the *audit*

Irrespective of the concept behind it, an *audit* makes use of certain parameters to measure the level of compliance with or adherence to predefined standards or requirements, in order to demonstrate the capacity of an institution to assure and develop its own quality (see chapter I.1). As well as observing national legislation when defining these standards or requirements, agencies often refer to the ESG. One can therefore observe a certain degree of convergence in the standards and criteria used in *audits* within the European Higher Education Area.

However, differences occur with regard to the themes covered by *audits*: although the organisation of the institutional quality management system and its effectiveness is the overarching topic, this may be subdivided into different performance areas such as study processes (learning) and teaching, research, societal interests etc.

The scope of an *audit*'s target or performance areas depends predominantly on the legal mandate of the agency. Whereas for example in Austria, Denmark, Finland and Switzerland the quality assurance system for research is an integral part of the *audit*, this is not true for the procedure in other countries. In the Netherlands, quality assurance in research is the individual responsibility of the institution. In Norway, as well as Spain, England and other countries, there are separate agencies responsible for this task. However, given that the provision of degree programmes at a higher education level perhaps presumes the existence of active research at the same institution, the conclusion could be drawn that internal quality assurance systems at higher education institutions always consider research in one way or another, as those systems tend to be expected to encompass the higher education institution as a whole.

It has been hypothesised that the absence of research in the *audit* in most countries is the result of three interconnected factors: the focus on teaching and learning in the Bologna Process; the historical development of external quality assurance procedures in different countries (programme accreditation); and the ESG, which in their current version are not intended to cover research.

The ESG are not mentioned explicitly in all *audit* models, but agencies refer to them in their daily operations and in the development of their external quality assurance procedures.

It is therefore no surprise that all agencies' procedures address higher education institutions' strategy and governance, and the use of institutions' quality assurance systems for their basic duties (mostly with the exception of research). With the assumption that a quality assurance system can only be useful if it is effective, the assessment of institutions' capacity to benefit from their own quality management processes is another topic in the *audits* carried out by the different agencies. The institutions need to prove that the implementation of their quality assurance system guarantees the quality of their basic duties.

The notion of *quality culture* has become widespread in both higher education institutions and in quality assurance agencies. It is linked to the kind of communication that exists at the institutions, to the implicitness of quality issues, and to the involvement of different stakeholders. Several approaches address the issues of *quality culture*. The concept, however, is difficult to define, and this may be one of the challenges in introducing it to *audits*. There is also the risk that *quality culture* could eventually be regarded as a fashionable catchword, liable to fall into disuse.

Stakeholder participation has become an area assessed in the *audit* in many countries, where the institution is not only expected to involve students, labour market needs or 'society' in its strategic planning and operational activities, but also is expected to demonstrate how this involvement is actually being utilised.

In Romania, public information on study programmes and standards for awarding diplomas are important areas of assessment, and in Denmark institutions must ensure that the content and objectives of their study programmes reflect the needs of society and the labour market. In other countries these topics are considered to be covered by other kinds of external quality assurance procedures, such as the accreditation of study programmes or

institutions. This statement is also true for other topics in various *audit* models throughout Europe, making it difficult to define the boundaries between one procedure and another (see also chapter I.6 on *challenges*).

1.4 *Audit* procedure

Audits, like other external quality assurance procedures, are typically conducted in the following stages: preparatory phase – self-report – peer review/site visit – peer report – decision/publication of the report – follow-up.

The relevance and the organisation of the different stages vary from one system to another. Also, there are sometimes major differences between *audit* and state accreditation/recognition procedures, due to their different natures, as mentioned in the previous chapters.

Preparatory phase

A preparatory phase is common to all *audit* schemes, although some are more extensive than others. This means that higher education institutions and agencies seek some kind of exchange before the higher education institution submits its self-report. This exchange must not affect the independence of the agency and its decisions and also must not be understood as consulting on the topics to be evaluated.

All agencies inform the whole higher education sector or single higher education institutions about their *audit* model, its requirements and implementation. Conferences and seminars are organised for this purpose, especially in the case of pre-defined *audit* cycles. These events may include the presentation of procedural guidelines, and also the presentation of practical case studies by higher education institutions that have undergone an *audit*. General information is always provided through the agencies' websites. Handbooks and guidelines are made available as soon as the method is agreed or at the latest when a higher education institution actually becomes involved in the process.

An agency may present the specific aspects of the realisation of the audit directly to a higher education institution. Some agencies give advice concerning the presentation of the quality assurance system (but not its development and implementation). Others perform a formal pre-check of

the system before the higher education institution actually enters the *audit* procedure.

Self-report

The formats of self-reports vary depending on the systems, as is clear in the variety of terms used, such as 'self-documentation', 'self-report', 'self-assessment', 'reflective analysis', '*audit* material', 'authentic material' etc. These illustrate that some agencies expect a higher degree of self-analysis or specify the requirements for a self-report (probably by providing a list of questions or even a checklist), whereas others invite higher education institutions to provide evidence about their system using available documentation. In Scotland, for example, institutions are asked to evaluate their activities and to provide evidence by giving examples of the documents showing the processes in use.

Agencies generally advise higher education institutions to leave enough time to prepare the self-report and to involve different interested parties (including students). Experience shows that institutions can benefit strongly from this process, and the learning effect is even stronger if deficiencies in the internal quality assurance system can be openly addressed and are not merely sanctioned as such.

Before submitting their report, higher education institutions may ask agencies for feedback regarding the clarity of the information provided. Although this can be an awkward step, it helps improve the quality of the entire process.

Depending on the specific *audit* model, higher education institutions may be asked to provide further evidence of their quality assurance system during the procedure.

Expert panel

As with any peer review, the quality of an *audit* largely depends on the quality of the peers who do the assessment. This involves thoroughly selecting and preparing experts who understand the concept and the spirit of *audits*. Empathy and a willingness to act on an equal footing with the higher education institution are essential conditions for taking part in an *audit*. Panels are mostly made up of between three and six peers, depending on the scope of the *audit*. Panels always include peers from other higher education institutions, although their profiles may be different: some agencies demand

leadership experience, such as (former) rectors, whilst others use “quality professionals”. Likewise, there are always student representatives on expert panels.

In some cases, panels include peers from the labour market. There is an increasing trend towards the involvement of peers from abroad, which provides the benefit of receiving an outside perspective, but leads to the challenge of acquainting these experts with the national framework. This is especially true for smaller countries with a limited number of higher education institutions. In any case, the disciplinary background of the experts turns out to be of subordinate importance.

The nomination of peers is mostly done on the basis of a pool of experts. To be accepted into a pool, peers need to follow guidance that varies in intensity, including written guidelines, information events or even training seminars. Often, at least one panel member has already participated in a prior *audit*.

Working with high profile peers requires good resources management, since *audits* are very demanding in terms of time.

Site visits

The organisation of two site visits is a feature common to almost all *audit* models. The first visit is generally of a more informative character with a focus on the overall system of quality assurance, while the second site visit serves to provide clear evidence about the quality assurance system and its operation in practice.

Agencies organise site visits differently. The first visit may be done either by the entire panel or by one of its members (usually the chair). During the first visit, which usually lasts one day, meetings take place with the higher education institution’s management and students, as a minimum. At the end of the visit, the higher education institution can be asked for further documentation to be provided in advance of the second site visit.

In cases where the procedure involves a second site visit, this usually takes a minimum of two days and involves further interviews with groups from the institution. Depending on the findings of the first visit, the panel looks for evidence of effective internal quality assurance system in specific areas. The agency has the important role of ensuring that the principles of its *audit* are respected, that peers are well prepared on the basis of the self-report, and that an agenda is drawn up that allows the necessary insight into and

understanding of the higher education institution's quality assurance system to be achieved.

Report, decision and follow-up

Like other external quality assurance procedures, the panel prepares its report in line with the agency's requirements. In practice, agency staff take on different responsibilities in this process: whereas some agencies actively participate in the drafting of the report, other agencies leave this to the responsibility of the panel. In either case, audit reports need to find the right balance between judgement about the system and advice for its enhancement. This becomes even more relevant if full reports are published by the agencies.

The type of decisions taken by the agency depends on the purpose of the audit, as described in chapter I.1. However, in most cases the procedure does not simply end with the publication of a decision and the report; agencies usually offer concluding seminars or follow-up visits to the higher education institution. These can be used to analyse the panel's report and its conclusions further, and to draw up action plans.

1.5 Impact/effects of the *audit*

External quality assurance makes higher education institutions accountable for their performance. Within the ENQA, and probably also within the agencies, the 'impact issue' is currently high on the agenda. The question is whether the *audit* has longer-term effects on the individual higher education institution, on the quality of its services, on national and/or international higher education policy, on the work of the agencies etc., and if so, what these effects are.

Approaches to learning about the impact and effects of an *audit*

One way of finding out the effects of an *audit* on an institution, on its quality assurance system and probably also on its study programmes is a *re-audit* after a certain period of time, and also other follow-up activities, where these take place. This implies, of course, that (a) the *audit* is not a one-off exercise, but something that is repeated periodically, (b) the *re-audit* asks for changes within the institution as a result of the previous procedure, and that (c) the scope of the *re-audit* is at least similar to the original *audit*.

One common activity used by agencies to learn about the impact of their procedures is the use of *feedback questionnaires*, provided at least to the *audited* institution and the panel members. The questionnaires go beyond technical issues, as they usually include inquiries about the expected effect the *audit* will have and the identification of areas for improvement. However, they alone are not necessarily considered to be reliable sources, as they involve too many variables, for example the time the questionnaire is given to the institution (which is usually after the certification decision) or the respondents' position and involvement in quality assurance.

In some countries, regular *system-wide analyses* are conducted. The German Accreditation Council conducted an initial meta-evaluation when system accreditation was implemented, whilst the Spanish agencies periodically conduct similar meta-evaluations in cooperation with universities, as well as cross-evaluations amongst themselves to check the homogeneity of results. This is due to the specific situation in the country, with a number of quality assurance agencies operating simultaneously. This is also true in Scotland, where significant focus is placed on the impact of different activities.

A couple of agencies organise *discussions* with various stakeholders from higher education institutions to debate the outcomes of the *audit* and the consequences these might or should have on the individual institution, on the national higher education system or even on legal provisions.

In addition to the systematic approaches, individual communication between an agency and an institution is a valuable source of feedback.

The impact and effects of an *audit* – lessons learnt (so far)

The reports from the various agencies reveal that the procedure has an effect on three levels: the higher education institution itself, the quality assurance agency, and the higher education system of a country (with some legal implications).

Quality assurance agencies intend *audits* to have an impact; otherwise there would be no need for them. This rather vague expectation can, however, have a broad meaning: if an *audit* is expected to have an impact on the higher education institution's quality management system, it can be implicitly assumed that at the same time it will have an effect on the quality of all processes at the institution – learning and teaching, research and related services. This would be evidence for the fact that the quality assurance system at the

institution is not an exercise carried out for its own sake, but instead correlates fully with the institution's operations. Another aspect could be the effect on an institution's management and strategies. Examples given by several countries prove that one of the consequences of the first *audit* round was the setting up of quality assurance units at higher education institutions. In addition, advanced interpretation and identification of elements that contribute to the analysis of quality in higher education were observed.

If instead of considering individual higher education institutions we look at the national higher education system as a whole, an *audit* might also influence education policy by taking its outcomes into account. For example, if the reviewers find evidence for the same or similar deficiencies in several institutions, this might provide evidence for the existence of a system-related matter, which might arise from (legally stipulated) requirements with which institutions must comply. Analysing these outcomes might result in a change to the country's education policy or framework. In Finland, for example, impact analyses led to quality-related benchmarking projects, to the launch of new thematic evaluations, and to a change in the themes covered during the following *audit*.

Furthermore, discussion is required on the effect of the *audit* on the quality assurance agency itself. As 'learning organisations', agencies use feedback about the outcome of the *audit* for the further development of their procedure, be it the process itself or its scope and themes. One common outcome of impact analyses (irrespective of how it is carried out) is that agencies use the results to develop the *audit* methodology and the scope of the procedure. There were cases when the standards and/or criteria used in the *audit* required a more detailed definition or explanation to be applied. An agency may decide that in the next *audit* the focus needs to shift towards a certain topic that has proven to be either underrepresented or not fully developed. It was revealed that in a number of cases of the first *audits* in a country's higher education system, institutions had only made first steps to set up internal quality management, but had not yet developed a coherent system. This meant that evidence regarding the effects of the internal quality management could not always be scrutinised. Here the agency can adjust its model accordingly, as well as developing its procedure for the next *audit*.

When doing so, agencies usually invite various stakeholders to contribute to their development process and involve a wide selection of representatives from higher education institutions. In addition to the management,

all people affected by an *audit* and its outcomes (students, teachers, administration, etc.) will have the opportunity to contribute.

In Switzerland, for instance, the follow-up after the 2013-2014 quality *audits* will form part of the discussion when preparing the planned institutional accreditations that will replace the quality *audits* with the entry into force of the new Federal Law on Funding and Coordination of the Higher Education Sector.

There is a very big question that underpins all these considerations: how do we know that changes and improvements are actually *audit*-driven and not the outcome of other processes independent of the *audit*? To take this thought to the extreme: Why shouldn't particularly good weather during the spring term contribute to better teaching and learning performance? Why couldn't well-functioning support services be due to the fortunate personal situation of employees? Why shouldn't the legal situation in higher education stimulate an improvement in an institution's strategic planning? These matters are widely discussed within the QAN, the ENQA, individual agencies, higher education institutions, etc., and they are certainly true for all kinds of external quality assurance procedures. Despite numerous discussions and substantial field work, no answer has yet been discovered. Regardless of the acknowledged responsibility of quality assurance agencies to discuss the issues of the effect of their work seriously, it should be mentioned that most quality assurance agencies were not set up as research institutions, and are thus neither competent nor staffed for proper research on this topic.

1.6 Current and future challenges and developments

As quality assurance must be seen within the context of national and international higher education developments and reforms, such as the Bologna Process, finding the balance between continuity and progress might be seen as one of the major challenges agencies have to face. It is therefore not surprising that on more than one occasion agencies emphasised the limits of national legislation, especially with regard to the EHEA.

For this reason, this publication will also discuss the future development and challenges facing the *audit* in the various countries. While the individual country reports reveal several specific issues closely linked to national legislation, the following four aspects were addressed by several agencies:

Moving towards more enhancement-led procedures

Looking at the recent developments in quality assurance procedures in the EHEA, one can observe a shift in many countries towards more enhancement-led procedures. In addition, the focus of quality assurance procedures is shifting from assessing the performance of the higher education institution to evaluating the internal quality management. This shift promotes the concept that procedures should not only assess the state of internal quality assurance but also support its enhancement. On the other hand, the country reports show that there is also movement in the opposite direction, from *audits* towards accreditation, for example in Switzerland.

However, several agencies set themselves the challenge of embracing both enhancement-led procedures and accountability, e.g. certification of the internal quality management system, as is the case in Austria. At first glance one could assume that *audits* that aim for certification and enhancement are pursuing two conflicting goals. On closer investigation, however, it becomes evident that the two aims are not that contradictory: confirming that an internal quality management system complies with a set of given standards does not exclude feedback on the system's future development, and vice versa. Besides, the development of higher education institutions is not only research-driven, but also tied to society. A quality management system will therefore also consider societal needs and adapt to the changed conditions of the higher education sector as a whole. The development towards more enhancement-led procedures might also reflect changes in societal requirements, where higher education institutions are understood as being autonomous institutions. 'Controlling' them thus becomes less important, and enhancement-led procedures are understood to be more in line with the aims of the higher education institutions.

Interaction of different procedures covering internal quality management, study programmes and other performance areas

When comparing the single country/agency reports it is clear that the question of how to improve the interaction between different external quality assurance procedures is closely linked to the previous topic of enhancement-led procedures: how can different procedures and approaches benefit one another and not multiply the workload of the higher education institutions and agencies? It is also important to avoid interference in the sense of one procedure anticipating or even counteracting the results of another. It therefore seems

important to think about ways of linking different procedures and avoiding overlap and double evaluation.

Based on the countries' reports, it is clear that many agencies both carry out procedures evaluating the internal quality assurance system as a whole and look at the study programme level. There is a discussion in some countries, e.g. Finland and Spain, on how to organise the *audit* that also provides information about degree programme quality. This appears to be the wish of the higher education institutions themselves, as they are interested in feedback not only regarding their internal quality assurance system but also their study programmes. System accreditation in Germany is one example where, thanks to this approach, both the internal quality management system and the study programmes are covered by one procedure.

Questions of consistency and equality

Another issue that was addressed by several agencies was the question of how to ensure consistency and equality in the external quality assurance procedures. To treat institutions equally and to conduct consistent procedures is, of course, a basic requirement for external quality assurance. This leads to the question of how to deal with the diversity of higher education institutions, not only in terms of size and profile but also in terms of the stage of development of their internal quality management system. For *audits* focusing on the implementation of internal quality management and the 'quality culture' of the higher education institution, it seems particularly necessary to take into account the unique nature of all the institutions. Finding a balance between system-wide indicators and the specific characteristics of the institution would seem to be crucial, and leads to the issue of how an agency can treat all higher education institutions equally and still consider the individuality of the single institution. Here it is questionable whether equality is achievable, as all procedures should focus on the advancement and development of the internal quality assurance of the higher education institution, and therefore respect its individual profile and approach.

One example of a method with this in mind has been introduced by QAA recently: their *risk-based approach* takes into account the characteristics of each higher education institution when assessing its quality management system. This of course might mean that not all higher education institutions are treated in the same way, as the procedures and the timeframe in which the procedures take place are linked to the current development of the quality

management system of the particular higher education institution. But it can be argued that equality and consistency can only be achieved when the profile and current development of the internal quality management system are at the heart of a procedure. Equality could therefore mean focusing on the development of an individual higher education institution with respect to its own quality assurance system.

Internationalisation

When asked for their challenges or future perspectives, almost all agencies brought up the matter of internationalisation. In general, agencies are keen for more international exchange and cooperation, and, to summarise, three areas are worthy of mention within the network: working with international peers on procedures, intensifying institutional exchange and the opportunity for some agencies to work outside their national context.

With regard to the first issue of working with international peers, some agencies have a long tradition of doing so, whereas others have only started recently. However, training international peers for the *audit* procedure seems to be a common challenge. Peers not only need be informed about the procedure but also need good insight into the respective higher education system. In terms of the responsibility of agencies, this implies providing a comprehensive overview of the higher education system and continuous communication with the peers before and after the site visits. Another aspect of working with international peers is the language barrier, as working with international peers often means either that the higher education institution must provide their documentation in a foreign language, or that the agency needs to use peers that are fluent in their national language. In the country reports this was addressed by several agencies as a major challenge for the years ahead.

Another topic raised by several agencies was the desire for more international exchange, principally concerning best practice, and to establish international cooperation. The QAN is one such activity, and exchanges of staff and information were also mentioned as possible forms of internationalisation.

An additional aspect of internationalisation identified was that agencies in some countries, such as Finland, Switzerland and Austria, are already active internationally with their *audit* procedures. This cross-border activity of agencies naturally raises several questions. As already discussed with regard to the issue of international peer experts, it might be asked how much knowledge of the national context of the higher education system is needed in order

to carry out *audits* in foreign countries. In addition, one might question the intentions of higher education institutions that choose agencies from abroad: is it done for marketing reasons? Does the institution want to get feedback from someone with a more distant view of its own higher education system? Are international peers or foreign agencies more prestigious? Or are there any other reasons? Whilst answering these questions might offer an opportunity to help agencies progress and quality assurance processes to develop, it cannot be done without reflecting the EHEA and the role played by the European Quality Assurance Register for Higher Education (EQAR).

1.7 Closing remarks

The QAN has proven to be a good opportunity for mutual exchange and learning, a valuable way of sharing best practice and a platform for fostering a common understanding of external quality assurance procedures, focusing on the development of internal quality management systems. All participants within the network contribute to establishing a comprehensive knowledge of the various developments and changes in external quality assurance in Europe. It is a unique opportunity to have an open forum to discuss and share experiences and to learn from each other. This publication allows the network to share its experience and knowledge with a wider public and to provide interested readers with an up-to-date overview of external quality assurance in a number of European countries.