Trends in quality audits

Study conducted among the agencies of the Quality Audit Network
Texts do not necessarily reflect the opinion of the publishers:

AQ Austria – Agency for Quality Assurance and Accreditation Austria and
QQI – Quality and Qualifications Ireland
Authors: Dietlinde Kastelliz (AQ Austria), Orla Lynch (QQI)

AQ Austria – Agency for Quality Assurance and Accreditation Austria
Franz-Klein-Gasse 5, 1190 Vienna, Austria
office@aq.ac.at, www.aq.ac.at
Typography based on a concept by: d-licious Köck und Rastbichler Grafik Design OG, Vienna
Editing: Barbara Mitterauer (AQ Austria)

Printed in Austria
Table of contents

Abstract 3

1 Introduction 3

2 Methodology 5

3 Changes made to institutional audits since 2013 5

4 Imminent changes to the institution-level audit (which will be implemented before 2020) 10

5 Wider agency changes (not audit) 12

6 Conclusions 15

7 Future trends 17

8 Appendix 1: Survey questions 18

9 Appendix 2: Agencies participating in the survey 22
Abstract

The paper is on recent, current and forthcoming trends in the work of 13 quality assurance agencies across Europe that are engaged in quality audits. It is based on a set of questions, which were discussed in a meeting of the Quality Audit Network in spring 2018 and then translated into a survey. In response to the survey, 11 of the 13 agencies described changes since 2013, with 5 out of 13 describing future changes. There is a trend towards the replacement of programme evaluation methodologies with institution-level audits. The main drivers for changes were and will be national legislation and a widening of the scope of the quality audit, in accordance with the wider missions of higher education institutions and the concomitant changes to agency methodologies that will be required. New approaches to site visits and (self-evaluation) reports are being tested. The context-sensitivity of audits is increasing and this impacts on both the scope and the methodology. The purpose for audit of contributing to the higher education institutions’ development is being kept balanced with the accountability purposes of external quality assurance.

1 Introduction

This is a study of the recent, current and forthcoming trends in the work of agencies in the audit space who are members of the Quality Audit Network (QAN). It covers the period 2013-2020. QAN was established as an informal group of audit oriented external quality assurance (QA) agencies within ENQA. The term ‘audit’ is defined by the Network as any procedure that has the QA system at the institution-level as its subject matter, regardless of whether this procedure is called institutional audit, quality audit, institutional review, institutional evaluation, institutional accreditation or is described by comparable terms.

In 2014, AQ Austria published the book “Quality Audit in the European Higher Education Area. A comparison of approaches”, which gave an overview of the audit procedures and approaches of 12 different quality assurance agencies in 2013, all of which were members of QAN. Recent discussion topics and presentations by members at QAN meetings and EQAF, led the authors to form the impression that the agencies with audit responsibilities, and the audits themselves, had altered significantly since the publication of the 2014 book. We formed a view that, though the kinds of alterations had differed from agency to agency, they centred on some of the following:

---

1 See Appendix 2 for the agencies who answered the survey
2 [https://www.pedocs.de/volltexte/2016/12088/pdf/AQ_Austria_2013_Quality_Audit_in_Europe.pdf](https://www.pedocs.de/volltexte/2016/12088/pdf/AQ_Austria_2013_Quality_Audit_in_Europe.pdf)
• The scope of the agency had been broadened to incorporate other levels of education (FET; VET; Schools);
• The scope of the agency had been broadened to include other functions (research funding, research performance, performance in general, awarding);
• The scope of the agency had been narrowed, in particular, in relation to decision-making which was made by another agency or a Ministry;
• The funding and/or resources of an agency had been cut;
• The agency had changed its methods, for instance there were adaptations to the incorporation of data;
• The quality assurance system at national level had changed, for example with a shift from programme to institutional level or the ways the assessment of both modalities were combined;
• Agencies may have commenced outsourcing some of their functions to third party bodies, either in part to professional services or, as a whole, to other agencies.

In order to support our assumptions through evidence and to test their veracity or otherwise, the Network decided to launch a Trends Survey amongst the QAN agencies in 2018. We were interested in finding out about the changes that took place in the agencies and their audit procedures in the last 5 years (2013-2018). We wanted to understand what those changes were and, if possible, the reason or sources for the change. Some agencies reported in QAN meetings that they were on the cusp of making changes, therefore we decided to expand the scope of the survey to include anticipated changes within the next years and are expected to be implemented until 2020.

It is important to note from the outset that this study was focussed on the trends in audits across the QAN and so has not overly concerned itself with the specific contexts for individual agencies and their audit procedures. Agencies operate within a range of different definitions, procedures and national contexts and so, to truly understand the nature of the audits carried out by QAN member agencies, the reader will need to dig more deeply with the individual agencies.

The audience of the report is firstly the agencies which are members of the Quality Audit Network. The Network itself has proven to be a valuable platform for discussions and the exchange of ideas on various issues of quality assurance and agency work. More widely, the report may be relevant for any actor who is interested in specific developments of (external) quality assurance in the European Higher Education Area, and they are invited to read the report and discuss it with us.

This study presents results from our survey on changes made since 2013 and imminent changes that are expected to be implemented before 2020. Following the synthesis of the findings, we will draw some conclusions and outline some trends that we see based on the evidence and the shared experience of working as members of QAN.
2 Methodology

At the QAN meeting in May 2018, there was a discussion about the development of a series of questions to capture recent and imminent changes to the audit procedures of agencies, as well as wider agency changes that may impact upon the audit procedure. Based on this discussion, the authors drafted a series of 26 questions and circulated them for comment and feedback to the 14 agencies of the QAN in May and June 2018. The questions were finalised based on the QAN feedback and a final version of the questions, in the form of a survey (via SurveyMonkey), was circulated to the agencies on the 18 June 2018. Appendix 1 provides a list of the questions and shows the distribution of open and closed questions and multiple-choice questions. The deadline of July 6 for completion of the survey was ultimately extended to the end of October 2018.

For simplicity the authors requested that one survey only should be completed by each agency. However, in Spain and the UK, where there are different approaches taken by individual agencies or sub-branches of agencies, we permitted the submission of an additional response.

When the analysis of the survey commenced it quickly became clear that question 3 „What caused your agency to change the procedure? (you can select more than one)”, though helpful in eliciting the vehicles for the change (legislation, agency decision etc.), was not phrased in a way that could draw out the source of the change. The authors contacted the agencies asking them to consider the reasons for the changes and to respond with a short paragraph. 6 responses were received. In total 13 separate responses were received to the survey (see Appendix 2).

3 Changes made to institutional audits since 2013

The findings in this section are based on the responses to questions 3-10 of the survey (see Appendix 1). These questions were completed by ten out of thirteen agencies, those that identified that changes had taken place in the last 5 years. 60% identified that the changes they had implemented were significant. Several agencies were on the brink of implementing a widespread audit methodology and had been making their preparations for this in recent years, in some cases pilot testing the methodology, so they also provided responses to these questions. Three agencies skipped this and subsequent questions about recent changes, which may be taken to indicate that they had experienced no significant changes in the last 5 years.

The main drivers for change to institutional audit since 2013 were legislation and the ESG 2015 (see Figure 1). Agencies also adapted and modified from within, with evidence that
the agencies own decisions and experiences with previous reviews drove changes in about 50% of cases. Some review cycles had come to an end and the agencies took the opportunity to review, modify and enhance their approach at the end of the cycle. In one case there was a Government instruction to adopt an institutional audit in addition to programme evaluations.

Figure 1: Reasons for recent changes to procedures

The focus of institutional audit became more distributed for agencies, in particular between purposes for teaching and learning, strategy and governance, facilities and infrastructure and the involvement of stakeholders. Also the purpose of public accountability and transparency towards the society at large became more relevant. Quality assurance of research, though growing, was a focus for less than 50% of the agencies and the third mission was a focus for less than a third of agencies.

Figure 2: Recent changes to procedures
Where changes occurred, a range of different changes took place (Figure 2). The most common kinds of changes were to the **scope of audits** and the **methodology** for them. Criteria were changed and augmented. An example of changes to outcomes was the introduction of a formal decision with the possibility of conditions, i.e. certain requirements that need to be proven by the institution in a follow-up. Other changes related to the use of data and statistics in audits and changes to the outcomes or consequences of audits. For instance, one agency introduced a new quality label for excellence.

More than 50% of agencies experienced a change to methodology. Where this happened, the most common changes were to the **composition of panels** and the **assessment scale and rules**. Agencies reported that changes in scope brought about a need for revised methodologies, along with efforts to make the context for the institution more relevant in the process. In some cases this might be linked to granting greater ownership for quality assurance to the institution. Agencies have innovated with the introduction of **workshops** in site visits, **benchmarking and benchlearning** exercises for institutions to learn from each other and specifying **sets of document requests** to institutions.

Eight agencies provided a deeper explanation of the changes that have taken place in the last five years. Agencies reported on the **interplay between institutional audit and programme evaluations**, and that institutional audit is gradually replacing programme evaluation. For instance AQU Catalunya stated once an internal quality assurance system has been assessed and certified, official study programmes falling within its scope that are submitted to assessment procedures for the purposes of validation, modification or accreditation will be exempted from the presentation of additional documentation on the IQAS. NVAO3 said that institutions put a lot of effort in the preparation of the institutional review and the development of their own conduct on the quality of individual programmes. In fact, Flemish institutions that choose to develop an own conduct on the quality of programmes, got the accreditation period automatically extended with 8 years for most of their programmes of which the accreditation period was about to expire.

The scope of audits in several instances has broadened to become **more comprehensive** and to make **greater use of existing data sources**. Audits are increasingly concerned with being **student-centred** and have introduced new methodologies to accommodate this, for instance NVAO reported a specific moment for the student council to interact with the panel. In England students have the option of producing a separate student self-evaluation report (Student Submission) and in Scotland institutions are expected to produce their self-evaluation report in partnership with their students and to identify the benefits of doing this. In Norway, student organisations are invited to submit a report on quality work at their educational institution. These initiatives may be linked to the revision of ESG in 2015, where student-centred learning became more prominent. Some agencies reported that they commenced looking at the social mission of institutions in their audits, for instance FINNEEC stated ...there is an increased emphasis on the student-centred approach and societal impact,

---

3 The practices of NVAO mentioned in this paper focus on the Flemish situation.
although “social mission/societal impact” had been introduced in 2005 in Finland. New objectives were introduced relating to the development of student competence, HEI promoting impact and the enhancement of quality. Enhancement and the encouragement of a quality culture became more explicit subjects for audits.

Agencies have been working to ensure that their audits became context sensitive. For most audits, the context of the institution is important. Agencies are finding new ways to work more closely with other higher education accountability frameworks, for example QQI reported that they now work more closely with the funding agency in briefing providers on the context for individual institutions. Some agencies introduced different kinds of audits for different evaluations. In some cases, the wider political or national environment was a driver, with the same agency developing different audit methodologies in different regions or countries, for instance in the UK there continues to exist a range of different QA methodologies, some of which are unique to different countries, such as the enhancement-led approach in Scotland, the inclusion of enhancement in Wales and the shift to outcomes/risk based focus of England, as determined by the new regulatory system established via legislation, the Higher Education and Research Act 2017. The same goes for NVAO, where separate Flemish and Dutch departments were established to accommodate differences in the educational and QA systems.

Methodologies evolved too, especially with regards to the composition of the panel and the organisation of the site visits. There was a growth in the use of international experts. FINEEC have started experimenting with the use of digital platforms for reporting and publication. There is also evidence of attempts at greater efficiency in methodology, with smaller teams and shorter visits. NOKUT stated that the committee now thoroughly assess the written documentation earlier in the audit process. The experts fill in their considerations for each requirement in the regulations in standardised forms before meeting the institution... Because of this systematic working process with the written documentation, NOKUT has gone from conducting two site visits to only one site visit for each audit. As part of the audits, the expert committees have two meetings with NOKUT’s staff: One 14 days before the site visit and one right after the visit. Conversely, as another form of efficiency to improve communications, some agencies also elaborated on the process with the introduction of more (two) visits (a planning visit and a main visit). Greater emphasis was placed on additional sources of evidence to complement the self-evaluation report, including data and other documentary sources.

Many agencies reported a concern about consistency among audits and the work they have undertaken to improve this. For some agencies e.g. AAQ, it has been a logical development to separate the decision making around audits, i.e. a separate body taking the decision from the agency conducting the procedure. Several agencies reported that their follow-up procedures for audits have also become more extensive. Agencies have begun to coalesce around a 3-point scale of assessment, along the lines of fully/completely – partially/conditionally – not fulfilled. ESG Part 1 has remained a key reference for audits.

The reported impacts of these changes were multiple. In the main the reported impacts have been for agencies and institutions. In general, the workload has increased for agencies and institutions because of the need to be more comprehensive, more transparent, to
provide more detail and to turn things around more rapidly. The intensity of this style of engagement was also emphasised. On the other hand, the administrative burden may have decreased (less bureaucracy and more added value to the increased workload); this makes the increased workload easier to digest. Agencies seem to be very mindful of the burden that audit creates and have worked with institutions to reduce their workload. In some instances the change brought about a shift of responsibilities from the agency to the institution, which was welcomed by the institutions thanks to the ownership and the improved contextualisation for external quality assurance. Agencies also reported they had invested significantly in guidelines for both experts and institutions. FINEEC has invested in the use of digital platforms as a means of increasing efficiency and transparency. Agencies reported that there was evidence that there has been buy-in from all key players in HEIs to the institutional audit approach. QQI highlighted that because the institutional audit approach was more closely aligned to institutional strategy and activity, external audit was a less disruptive piece and more conducive to continuous improvement.

As audit team and agencies navigate away from compliance to enhancement-led approaches, it has been necessary for them to develop a different set of skills. Agencies have taken additional efforts in training audit teams in order to develop the skills required for this new approach. A key advantage of this change has been the more positive attitude of institutions to audits and this approach is reported as more conducive to the development of a quality culture in institutions.

Agencies reported that though there was some initial scepticism by stakeholders about ensuring accountability in a move away from solely programme-based evaluations, key stakeholders seem to have warmed to the concept of institutional audit. In some instances agencies reported a need for greater engagement with stakeholders, particularly students and employers.

Many agencies did not think they were yet in a position to comment on the perceived strengths and weaknesses of the changes in the last 5 years, as it was too soon since the introduction of their audit approach. There is a perception, yet unproven, that institution engagement may be less open when self-evaluations are published and therefore of less use to the institutions and audit teams. There was an awareness of the demand for greater context sensitivity in audits. Agencies recognised that moving to an audit-led approach posed a risk of less opportunity for comparability between programmes and potentially less openness and transparency for institutions. Providing greater autonomy and transferring more responsibility to institutions also means a greater workload for institutions and a need for training and investment in institution staff. At the same time, it involves an increased added value for the institution when compared to other external QA procedures, which declined in impact over time.

There are perceived benefits of institutional audits for institutions [too] with greater awareness of benchmarking opportunities, opportunities for institutions to learn from one another, increased ownership and responsibility, increased visibility of and transparency about the quality of study programmes in some cases, greater confidence in higher education and an improved quality culture. Widening participation in QA was also a stated benefit.
4 Imminent changes to the institution-level audit (which will be implemented before 2020)

The findings in this section are based on the responses to questions 11-18 of the survey (see Appendix 1). Responses to these questions were provided by five out of thirteen agencies, namely Quality and Qualifications Ireland (QQI), The Accreditation Organisation of the Netherlands and Flanders (NVAO), The Danish Accreditation Institution (AI), Agency for Quality Assurance and Accreditation Austria (AQ Austria) and the Swedish Higher Education Authority (UKÄ). Some of the agencies who answered to the previous section about changes made since 2013 also might foresee further changes. As most of them have only recently revised their audit models, their imminent changes will likely be adjustments to the revised models.

Figure 3: Reasons for planned changes to QA procedures

When asked about the reasons for the imminent changes to their procedures (Figure 3), most agencies opted (3 each) for legislation, the agency’s own decision and experience with a previous external QA procedure. Funding was not selected as a reason and the ESG 2015 were chosen only once. Given that some agencies selected more than one reason (altogether the five agencies opted for 16 responses in total), it can be assumed that changes to procedures will come about as a result of a combination of causes and this was supported in the attendant commentary. One agency also stated that reforms in the higher education landscape will also impact on their planned schedule of audits.
Figure 4: Planned changes to QA procedures

The most common selected future change (Figure 4) was **scope** (four out of five), whereas the category stakeholder was not selected as a factor by any agency in the forthcoming changes. The second most opted-for category was **methodology** (three out of five). Overall 15 responses were given, which made an average three different key intended changes to procedures per agency.

Where agencies intend to change their methodology (three out of five), the **number of site visits**, **assessment rules** and **assessment scales** were each chosen twice. Additionally, one agency mentioned that the **number of site visits is still under debate**. The composition of the panel was not a factor that any agency planned to change. One agency identified that reporting will change, though it did not identify what this implies.

All five agencies took time to describe in greater detail their key intended changes. However, it was not easy to determine common themes across the agencies or draw conclusions that might be valid for all agencies. Major topics to greater or lesser degrees for the agencies were the **(broadening of the) scope** of the audit, the **design of the standards**, an approach which is more fit-for-purpose and includes differentiation in for instance the operationalization of criteria, the **interrelation between the institutional audit and programme evaluation**, the determination of freedom of choice with regard to the **number of site visits**, the **use of information and data sources**, an **enhancement focus** and **more developed follow-up procedures**. **Reducing the burden** and **increasing efficiency** were also important aims for the intended changes.

A clear and prevalent finding with regard to the expected impact by the agencies is the **evolving relationship between them and the higher education institutions**. The intention is for external quality assurance to be seen as an added value for higher education institutions, rather than a burden. Agencies plan to design their methodologies to articulate with institutions’ context and needs and, thereby, to reduce the burden for them. Emphasis is being placed on dialogue between the institutions and the agencies and providing greater freedom and autonomy in the internal quality assurance systems of higher education.
institutions. It is intended that this will result in greater ownership of the quality system by institutions and thereby encourage the growth of quality culture. It is clearly intended that a control-driven approach will diminish in significance over time. Therefore, the expected impacts of this strategy will affect both sides of the compliance/enhancement coin.

Another expected impact within an agency is on the scale and type of resources required, resulting from both the changed schedules of reviews and the reduced number of site visits, though the kind of change is not consistent, in some cases requiring more resources and in other cases less. Another effect might be a reduced number of procedures due to the shift away from the programme to the institutional level for external quality assurance. As the systems develop over the coming years it is also predicted that the impact on stakeholders might evolve due to increased stakeholder engagement.

The anticipated strengths and opportunities dominate over the predicted weaknesses and threats for what is about to come. One big strength, exposed in the paragraph above, is the increase in the higher education institutions' ownership and autonomy for quality assurance. With this comes a need for heightened context sensitivity from the agency side and a positive impact on the quality culture at the institution. While a tendency towards context sensitivity is mostly perceived positively by the agencies, there was a view that it has the potential to become a threat if it results in inconsistent decisions across the higher education sector. The same is true with the turning away from a focus on study programmes, as there is a perception that this could reduce transparency for the public. Therefore, the importance of public information provided by the institution is stressed in the agency's methodologies. As already mentioned above, the reduced burden for higher education institutions is considered to be a potential opportunity. Wider impacts were also set out, for instance at UKÄ, the hoped-for enhanced link between research and education at higher education institutions, through a broadened scope for the audit, is regarded as an opportunity for the higher education system which could lead to stronger links between the agency and the research councils.

5 Wider agency changes (not audit)

The findings in this section are based on the responses to questions 19-25 of the survey (see Appendix 1). Ten out of the 13 agencies responded to these questions. Examples of the kind of wider agency changes that have taken place include changes to the agency’s status, like with the Catalan University Quality Assurance Agency (AQU Catalunya) or the Spanish Agency for Quality Assessment and Accreditation (ANECA) or the extension of the agency’s responsibilities, which is true for AQ Austria and UKÄ. The German Accreditation Council (GAC) will become the only decision making body in Germany, whereas the reviews themselves will be conducted by different agencies. The NVAO is experiencing effects on its organisational structure as a result of the diversification of the quality assurance systems in the Netherlands and Flanders. Due to a merger in Finland, FINEEC also encountered an organisational and administrative change.
The primary causes of changes to agencies (Figure 5) seem to closely correspond with the reasons for implemented or imminent changes to the audit processes (see analysis of sections 2 and 3). Legislation was the most referred to cause for change, in seven of ten agencies. Nearly every agency highlighted more than one cause (altogether 19 responses were given). The least significant sources of change, with one agency only selecting each, were the ESG 2015, stakeholder proposals and funding. Agencies also identified other causes, such as the merger of small agencies into larger entities, usually for monetary reasons, with aims to save in administrative costs and to improve coordination in the case of FINEEC and a change in the role of the agency in the case of UKÄ, with a role in governmental investigations in areas such as resource allocation to higher education institutions.

Scope of activity was the one category of key changes (Figure 6) which stood out from the others (seven of ten agencies), changes around stakeholders were at the other end of the spectrum (only one instance of this). Both the role of the agency and funding/resources...
were identified as key changes by half of the respondents. It is interesting to note that, though a factor in wider agency changes, funding/resources was not identified as a cause for changes to audits themselves. As with the other quantitative answers, the agencies chose various categories of key changes. There were 30 responses altogether, with each agency defining an average three key changes for the years ahead.

The descriptions of the key changes largely reflected the responses that had been already provided in the preceding sections. One consistent conclusion can be drawn from the responses; that the trend with new legislation has been to **simultaneously require a wider scope for agencies, as well as revised relations between agencies and different stakeholders**. Otherwise, the responses were too specific to identify common denominators between agencies. Unsurprisingly, as they are usually most affected themselves, nearly half of the respondents (three out of seven agencies) identified the changes as very significant, whereas only one agency thought they were moderate or only slight.

Agencies recognised that the greatest impact of the changes will be for the agencies themselves, and to a lesser extent for the higher education institutions and the stakeholders. One key impact is in relation to staffing with an anticipated **greater workload for staff** and a **need to employ new staff** to meet the needs of the agencies’ expanded responsibilities. Agencies reported that on the one hand running several different procedures at one time within a single agency encourages the exchange of ideas and experiences, and on the other hand makes it more demanding for each employee to stay up to date.

The perception of impact on the higher education institutions differed considerably from one agency to the other, depending on the kind of changes envisaged. While QQI expected **greater regulation of private provision** at the same time as **greater autonomy for some higher education institutions**, and higher education institutions in Germany will have to **deal with two counterparts**, the decision-making body (GAC) and the agency conducting the review, most agencies reported a low impact of their changes on the institutions. There were different interpretations on the definition of stakeholders by agencies. In sum, it seems that the stakeholders’ role(s) will be strengthened, for example by having a stronger representation in procedures and, moreover, stronger representation on agency governing bodies.

The analysis of agency changes demonstrates a colourful, heterogeneous picture, though there were generally lower responses to this section by the agencies. Therefore, we should take care in drawing wider conclusions about the results of this section in particular.
6 Conclusions

This survey provides strong evidence that external quality assurance is not a static space and that agencies function within a continuously changing and evolving quality assurance – and higher education – environment. Many agencies reported significant changes to their quality audit procedures in the past 5 years. Agencies are less certain about the changes to come, with only 5 agencies in a position to plot out the coming changes for the upcoming years. One overarching message around the direction of travel for external quality assurance agencies is an increasing role for quality audit in gradually either complementing or replacing programme evaluation methodologies.

In summary, key trends in developments in agencies since 2013 have been:

- Greater orientation towards context sensitivity, with an awareness that because the institutional audit approach was more closely aligned to institutional strategy and activity, external audit was a less disruptive piece and more conducive to continuous improvement;
- A growing awareness of the interactive relationship between audit and programme review;
- A broadening of audit scopes;
- A shift towards enhancement-led audits;
- Greater use of data and information to balance self-evaluation reports and interviews;
- Cohesion to a 3-point scale of assessment from positions of less and more points;
- Increased transparency in methodologies;
- Greater awareness for stakeholder relations;
- Increased emphasis on the context of institutions; and
- Changes to methodologies, particularly the number of site visits, team composition and size.

Agencies reported that the introduction of institutional audits in the last 5 years had contributed to an increased emphasis on quality culture and a more positive disposition towards quality assurance, especially amongst institutions. However, there is a burden on resources commensurate with this change and agencies have made conscious efforts to reduce the burden for higher education institutions and make their processes more efficient.

In terms of imminent changes, the key trends are:

- National legislation and agencies’ previous experiences will be the main drivers for changes to audits;
- Agencies will increasingly understand the benefits of a context sensitive approach to external quality assurance, and place the reality of the situation of institutions at the centre of their approach, making it more collaborative as a result;
- Agencies will actively work to reduce the administrative burden for higher education institutions;
- A broadening of the scope, creating the potential for institution-wide audits that may not solely be focussed on teaching and learning; and
- Strengthening the ownership of quality assurance by higher education institutions.
Certain similarities can be observed in the implemented changes and the imminent ones. The reasons why some changes have already taken place and why some are in the planning phase may be derived from the different phases of implementing national regulations or audit cycles.

Agencies reported that ESG was of diminishing impact on their changes as we move away from 2015. This can be deduced from the fact that in the past 5 years 50% of the agencies regarded the ESG to be a major driver for change, where for the future changes only one agency thinks the ESG will play an important role when it comes to their reasons for making changes. However, most agencies will continue to focus on becoming more student centred since the introduction of the 2015 version of ESG.

More important influences have been and continue to be the broadening of the scope of quality assurance into areas such as research and the third mission of higher education institutions. Another significant factor influencing change is the momentum generated by the agencies themselves, this study provides clear evidence that they are modifying their approaches as they progress through iterations of audit cycles and learn from their own experiences.

When taken together, both recent and imminent changes indicate a broad recognition that the audit model provides increased autonomy for institutions. Agencies see an opportunity for the growth of a quality culture from within institutions in contrast to an externally imposed control culture. Agencies also, however, recognise that this implies a transfer of responsibility from the agency to the higher education institution. This is particularly true for programme quality, and it is coupled with a more comprehensive concept of quality assurance, which carries with it an attendant workload for institutions. Furthermore, different skill sets are required of agencies, in terms of both staff and experts to handle these changes. Concerns continue to be expressed about consistency and comparability between the audits of higher education institutions. At the same time agencies recognise the advantages of providing for context sensitivity in audits and allowing for openness and honesty in the engagement between agencies, experts and higher education institutions. There is some work to go in striking the balance between transparency and accountability in audits.
7 Future trends

In the light of the conclusions based on the material provided by the agencies and grounded on the experience in the context of the agencies’ work, we see three meta trends across the tendencies that were reported in the survey.

• The relationship between compliance and enhancement is not straightforward. Even the most highly enhancement-oriented audits retain elements of compliance, albeit just a structure to guide discussions on enhancement. Some agencies can find it difficult to grow an emphasis on enhancement, especially in cases when the audit ultimately results in a compliant/not compliant decision that has consequences for institutions. Therefore, it might be necessary to develop a more elaborate understanding of the relationship between enhancement and compliance to guide the work of agencies as they increasingly orient themselves towards the enhancement space.

• QAN agencies are at various stages of implementing quality assurance cycles. For those that have experienced several cycles of external quality assurance, be it programme evaluation or institutional audit, it has been a challenge to retain interest and buy-in from stakeholders and to ensure that quality assurance continues to be meaningful and purposeful. The impact of external quality assurance could easily decrease with repetition. Therefore, three trends in the elaboration of external quality assurance in agencies with repeated cycles can be observed: one is the evolution from programme-level to institution-level procedures; the second is a trend towards the introduction of specific foci or themes for the external quality assurance; the third is a trend towards increasing levels of institution context and/or mission sensitivity. None of these trends is mutually exclusive and all of them are highly dependent on the growth of a quality (assurance) culture in agencies and institutions and the development of highly sophisticated communications and interactions between institutions, agencies and key stakeholders.

• Higher education institutions are very focussed on performance-related reporting and evaluation, as it is often closely tied to funding. This is effectively a parallel form of external accountability to quality assurance, and it is becoming increasingly systematised and influential, particularly on institutional strategic planning. There is work here for external quality assurance agencies to understand this system and its influence on the quality culture and quality assurance systems of institutions and attempt to comprehend it within the audit process. At the same time agencies must ensure that quality assurance is not confused with funding decisions, even where funding is directly tied to the number of accredited programmes. Institutions are becoming co-dependent on external quality assurance and of other kinds of external accountability. In order to be able to keep a balanced focus on external quality assurance, agencies will on the one hand need to build their understanding of the other forms of accountability and the influence that they have on institutional behaviour and on the other build their understanding of where quality assurance, and particularly quality assurance of the implementation of an institution’s mission and strategy, articulates with the strategic development of the institution.
8  Appendix 1: Survey questions

Section 1: Agency context

1. Provide a short summary (max. 250 words) of the overall framework in your country for institution-level audit.

2. What is the focus of your institution-level audit? (you can select more than one)
   - teaching and learning
   - research
   - wider mission and service to society
   - strategy and governance
   - links to employment/industry
   - facilities and infrastructure
   - administration of the institution (accounting, reporting etc.)
   - appointments/careers/personnel/HR
   - involvement of stakeholders
   - other (please specify)

Section 2: Changes made to the institution-level audit procedure since 2013

3. What caused your agency to change the procedure? (you can select more than one)
   - legislation
   - ESG 2015
   - agency's own decision
   - stakeholder proposals
   - outcome of a review
   - funding
   - experience with a previous external QA procedure
   - other (please specify)

4. Can you categorise the key changes that have taken place? (you can select more than one)
   - purpose
   - scope
   - use of data and statistics
   - stakeholders
   - teams/peers/reviewers
   - governance
   - outcomes/consequences
   - methodology
   - other (please specify)
5. If your methodology has changed, can you specify which aspects have changed? (you can select more than one)
   • composition of panel
   • number of site visits
   • reporting
   • assessment rules
   • assessment scale
   • other (please specify)

6. Briefly describe the key changes that have taken place. Based on the responses to the last 'Trends' Study, the most useful information here is a summary of the key changes (max. 200 words).

7. Based on your experience and feedback that you may have received, how significant has the change to the procedure been?
   • very different/very significant change
   • somewhat different/significant change
   • somewhat similar/moderate change
   • very similar/slight change

8. Describe any evidence that you have of the impact of the change on: (max. 200 words each)
   • your agency
   • higher education institutions
   • stakeholders

9. Describe any strengths/weaknesses/opportunities/threats that you may have identified from the change.

10. You can provide additional comments about changes to the audit procedure here.

Section 3: Imminent changes to your institution-level audit which will be implemented before 2020

11. What will cause your agency to change the procedure? (you can select more than one)
   • legislation
   • ESG 2015
   • agency’s own decision
   • stakeholder proposals
   • outcome of a review
   • funding
   • experience with a previous external QA procedure
   • other (please specify)
12. Can you categorise the key changes that you intend to make? (you can select more than one)
   - purpose
   - scope
   - use of data and statistics
   - stakeholders
   - teams/peers/reviewers
   - governance
   - outcomes/consequences
   - methodology
   - other (please specify)

13. If you intend to change your methodology, can you specify which aspects you plan to change? (you can select more than one)
   - composition of panel
   - number of site visits
   - reporting
   - assessment rules
   - assessment scale
   - other (please specify)

14. Briefly describe the key intended changes (max. 200 words).

15. Based on your experience and feedback that you may have received, how significant will the change to the procedure be?
   - very different/very significant change
   - somewhat different/significant change
   - somewhat similar/moderate change
   - very similar/slight change

16. Describe any evidence that you have of the impact of the intended change on: (max. 200 words each)
   - your agency
   - higher education institutions
   - stakeholders

17. Describe any strengths/weaknesses/opportunities/threats that you anticipate from the intended change.

18. You can provide additional comments about intended changes to the audit procedure here.

Section 4: Agency Changes i.e. changes that have not been explained in Sections 2 and 3

19. Have there been any recent changes or are changes imminent to your agency tasks/functions/purposes?
20. What is the cause of these changes? (you can select more than one)
   • legislation
   • ESG 2015
   • agency's own decision
   • stakeholder proposals
   • outcome of a review
   • funding
   • other (please specify)

21. Can you categorise the key changes? (you can select more than one)
   • role of the agency
   • scope of activity
   • methodologies
   • use of data and statistics
   • stakeholders
   • governance
   • funding/resources
   • staffing
   • other (please specify)

22. Briefly describe the key changes that have taken place/will take place. Based on the responses to the last 'Trends' Study, the most useful information here is a summary of the key changes (max 200 words).

23. Based on your experience and feedback that you may have received, how significant are these changes?
   • very different/very significant change
   • somewhat different/significant change
   • somewhat similar/moderate change
   • very similar/slight change

24. Describe any evidence that you have of the impact of the change on: (max. 200 words each)
   • your agency
   • higher education institutions
   • stakeholders

25. Describe any strengths/weaknesses/opportunities/threats that you may have identified from the change.

26. You can provide additional comments about the change to your agency here.
9 Appendix 2: Agencies participating in the survey

- Swiss Agency for Accreditation and Quality Assurance (AAQ)
- Danish Accreditation Institution (AI)
- National Agency for Quality Assessment and Accreditation of (ANECA)
- Agency for Quality Assurance and Accreditation Austria (AQ Austria)
- Catalan University Quality Assurance Agency (AQU Catalunya)
- Finnish Education Evaluation Centre (FINEEC)
- German Accreditation Council (GAC)
- Norwegian Agency for Quality Assurance in Education (NOKUT)
- Accreditation Organisation of the Netherlands and Flanders (NVAO)
- Quality Assurance Agency, Scotland (QAA Scotland)
- Quality Assurance Agency, UK (QAA UK)
- Quality and Qualifications Ireland (QQI)
- Swedish Higher Education Authority (UKÄ)