

Comments by AQU Catalunya regarding the:

*“Report of the panel reviewing the Agency for  
Quality Assurance in the Catalan University System  
(AQU)*

*August 2007”*

**Barcelona, September 3, 2007**

For the first time, AQU Catalunya has undergone a process involving the external assessment of its activities according to the ENQA Standards and Guidelines (S&G). External assessment processes based on S&G are in an emergent stage of construction within the European framework. Within this context, and with the intention of contributing to the improvement of these processes, we believe it appropriate to first make some general remarks (section 1) to be taken into account in the meta-assessment of agency external review processes and also to provide a better context for the specific comments made by AQU Catalunya for the panel's findings and evaluation that follow in section 2.

## **1. General remarks**

### **Start of the process**

Due to the absence of a national regulatory scheme in Catalonia and Spain, AQU Catalunya and ANECA made a joint request in 2006 to be assessed by ENQA. ENQA agreed to carry out this assessment.

Given that there were no existing benchmarks for such an international assessment within the European context, the two agencies drew up an evaluation guide, the sole reference for which was the theoretical model of the S&G, and the internal assessment process itself was started in June 2006.

The *Guidelines for national reviews of ENQA member agencies*, which came out at the end of 2006, were of great interest as a source of reference but the document was not available at the start of the process of evaluation of the two agencies. As is stated in these Guidelines, the content and structure of the self-evaluation report must be negotiated with the Review Panel. In the case of AQU, this stage could not be carried out. The panel's report also states that the external review process *was designed in the light of the ENQA policy on "ENQA-organised external reviews of member agencies"*, a document unknown to us and which, to our knowledge, has not yet been published.

In the Terms of Reference (ToR) for the evaluation of AQU Catalunya, a focus on compliance with the S&G and also teaching staff evaluation was requested. The inclusion of teaching staff assessment, aside from being an exception within the European context, also offered AQU a good opportunity to obtain feedback from an international panel of experts. The importance of this activity within the context of AQU Catalunya is determined by the binding legal framework.

Certain aspects of the internal and external assessments in this process were affected by the abovementioned considerations.

### **Internal assessment process**

Bearing in mind that the external assessment of European quality assurance agencies is an emergent process, that the self-evaluation report is the key piece to the entire evaluation process, and that a self-

evaluation quality report is in itself a valuable indicator, we are of the opinion that the report should have contained, as an important element, an analysis and evaluation of both the contents and structure of the self-evaluation report and of the procedure used for its preparation.

### **External assessment process**

With regard to this process, we would like to make several remarks concerning the composition of the panel and the scale used for assessment.

It is important to point out that the composition of the external panel, which was very professional and in general well balanced, was lacking a member with an in-depth knowledge of the complex regulations of the Catalan and Spanish university system, which may have hindered the external review process and lessened the efficiency of the visit, given that part of the time in the interviews had to be spent explaining this regulatory framework.

The fact that no explanation is given, neither in the report nor in any other reference document, of the meaning of the scale used for the assessment of compliance of each of the criteria in the S&G may lead to misunderstanding in terms of both the meaning of the judgment given in the report for each standard and the specific remarks that AQU Catalunya makes with regard to each judgment. For example, does 'substantially compliant' correspond to, roughly, 60% or 90% of a hypothetical full scale? In this context the border between 'full compliance' and 'compliance in a degree of excellence' is blurred and, when the panel makes recommendations, at times it is not clear whether these are orientated towards achieving compliance or to improvement beyond this point, which is evidently always possible no matter the actual degree of excellence.

### **The findings of the panel's report**

We consider that the report is a complete and acute diagnosis of the AQU's activity in the light of the S&G, that it complements and expands on the self-evaluation report and gives AQU a good repertoire of actions for improvement. We especially acknowledge the recommendations concerning the design of a strategic plan and better integration of all of the agency's activities, and we shall immediately set to work along these lines and also to rectify other weaknesses detected in the overall evaluation process. We thank the panel for its efforts, interest and exhaustive work.

We do feel however that the report is written in a somewhat negative key, which might obscure the idea given of AQU's overall activity. Although a clear-cut separation between the S&G criteria is not possible due to the fact that interconnection is unavoidable, we also think that there is an excess of cross-over and overlapping between arguments and recommendations that appear repeated in several criteria, such as the use of the lack of a strategic plan, whose evident importance, we think, is somewhat overvalued in the analysis of compliance. Our main discrepancies with the report's contents however concern the meaning of

the term 'substantial compliance' and the border between compliance and excellence, explained above.

Lastly, we would also like to comment that, since the teaching staff assessment programme is not included in the S&G, AQU made an effort in its SE report to set up standards (propriety, utility, feasibility and accuracy, pp. 40-45) which are not commented in the panel's report. The short paragraphs dedicated in the report to this activity do not actually seem to concur with the importance given to this in the report in relation to the S&G criteria; neither do they provide any recommendation for improvement of the technical development of the teaching staff assessment programme.

## 2. Specific comments on the panel's report

In this section of the document some specific comments are made regarding the report that we consider to be relevant regarding its interpretation and which, at the same time, may exemplify the general remarks made above.

Comments to: **3 Findings**

### **3.1 ESG 3.1 (and section 2)/ENQA criterion 1: Use of external QA procedures**

*2.2 Development of external quality assurance processes:...*

*(p. 9) ...The Review Panel recommends that the Agency should be more pro-active in developing its external quality assurance processes. Especially for the new bachelor degree programmes, it should develop a concept for their evaluation (e.g. starting a pilot project).*

AQU had already set in place a methodology to evaluate new bachelor degrees. At the present time, it is only the Spanish legislation regulating new Bologna programmes (due by October 2007) that is pending implementation.

Evidence: 1 Criteria for degree accreditation,

[http://www.aqu.cat/uploads/pagines/arxiu%20pdf/EstandardsAcreditacio\\_ang.pdf](http://www.aqu.cat/uploads/pagines/arxiu%20pdf/EstandardsAcreditacio_ang.pdf)

*2.4 Processes fit for purpose: All external quality assurance processes should be designed specifically to ensure their fitness to achieve the aims and objectives set for them.*

*(p. 9) The load of compulsory activities inevitably leads to a priority given in the work of the Agency. But taking also into account the international experience, the lessons from the Bologna process, and the need for sustainability and assistance in the development of internal quality assurance processes at HEIs, AQU should develop a clearer view about reaching a better balance and dedicating enough resources between all its assigned missions (see AQU statutes) within its future activity, including the evaluation of services and management, as has already been done for example with the libraries' evaluation programme. In the view of the Review Panel the drafting of a strategic plan, as mentioned above, could be a useful tool to better integrate all evaluation activities and help to consider giving more room to the progressive development of cyclical institutional evaluation. It is also advisable for work to be done on the criteria for the ex post evaluation of Masters degree programmes (as this will have to begin in two years' time).*

The relevance of these comments, which essentially duplicate those given in reference to 2.2 (development of external quality assurance processes), in relation to the specific standard 2.4 (processes fit for purpose) is not very clear.

2.5 Reporting: Reports should be published and should be written in a style, which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find.

(p. 10) *There seems to be room for improvement in relation to the ex ante accreditations of new master degree programmes: AQU does not make the final decision in the sense that it would approve of a degree programme. Decisions to establish them are made at governmental level: there have been cases where such programmes have been started even though they were negatively assessed by AQU and did not meet quality standards as stated by the CAQ.(...)*

This reasoning is somewhat confusing since there is no room for improvement regarding the subject in the paragraph quoted above: the role of the agency with regard to programmes, as stated by law, is (as for any other agency) the evaluation, accreditation and certification of programmes which are established or approved either by the government or the universities themselves. On the other hand, if improvement refers to the paragraph that follows the one above, which refers to the publication of AQU evaluation results, so that *the relevant stakeholders are informed about AQU's quality assessment conclusions*, there is little room for improvement in the present situation (*AQU publishes the results together with the full reports on quality assessment*).

### **3.4 ESG 3.4/ENQA criterion 3:**

#### ***Resources***

*"The Agency should have adequate and proportional resources, both human and financial, to enable it to organise and run its external quality assurance process(es) in an effective and efficient manner, with appropriate provision for the development of its processes and procedures."*

(p. 15) *In addition, the specific "burden" put on AQU with teaching and research assessment activities, human resources available for their core activities are further reduced.*

This affirmation is not totally correct, as the report itself confirms further on in the text: (pp. 15-16) *The assessment of teaching staff and teaching staff research competence accounts for a large part of the budget: since this one is based on the activities plan, and each activity is accounted for independently, this does not affect the adequacy of funding allocated to AQU Catalunya's other activities, with the only exception of the detected shortage of staff. However, this is in the stage of being resolved with the new budget.*

(p.15) *Although resources seem to be adequate from a general quantitative point of view, the review panel finds that there seem to be organisational problems that prevents AQU from using them in a more effective manner. On the one hand, there seems to be a high degree of compartmentalisation within the Agency with the result that there is a lack of a sense of identification and ownership of especially many committee members. In the interviews, the review*

*panel found that most of the different committee members only focus on their particular task and have no overall picture of the Agency's activities and how their activity fits into the larger picture.*

As explained in the SE report, the Agency's operations are carried out through three committees that deal with institutional and programme quality (Quality Assessment Committee, QAC), research assessment (Research Assessment Committee, RAC) and junior teaching staff and professor accreditation (Tenure-track Lecturer and Collaborating Lecturer Committee, TLCLC). While the QAC is concerned with the full range of activities covered by the ENQA S&G, the other two deal with the atypical teaching and research activity evaluation, for which AQU requested a specific evaluation in the ToR. As pointed out in the SE report, and further stressed by the panel, this task is mostly self-contained and independent of the S&G; furthermore, the committee members act mainly as external advisors, and are chosen according to their specific academic or professional competence. Given this, it is but reasonable that they focus on their specific tasks (the QAC on one side, the other two on the other). In any case, we do not find that this affects AQU's resources nor its effectiveness or efficiency, as stated in the criterion under analysis.

(p. 15, continuation of the previous paragraph) *On the other hand, it would appear that the Board of Directors does not carry out its tasks in a very effective manner in the sense that the Board's main functions are "to approve the annual activities agenda [...] and to establish the Agency's strategic goals" (SE-report, p. 4).*

We disagree with the statement that the Board of Directors "does not carry out its tasks in a very effective manner", which is unsupported by any reference. Furthermore, what should the functions of a Board of Directors be in order for its activity to be considered effective? It is our point of view that, despite there being weaknesses in its composition, as identified in the SE report, its functions, especially with regard to the setting of the Agency's strategic goals, are properly established.

(p. 16) *Given the evidence mentioned above, the Review Panel concludes, that the Agency **has adequate and proportional resources, both human and financial**, but due to the facts mentioned above (lack of a strategic plan integrating all activities and the relative load of some specific compulsory activities) the Review Panel concludes that AQU is **substantially** compliant with this ENQA criterion.*

The statement in the first part of the paragraph, and the objections based on the lack of a strategic plan and the load of some specific compulsory activities (evaluation of teaching and research activities) which, as explained above, do not affect the resources for the rest of the activities, may lead to the interpretation that, in the case at hand, 'substantially compliant' lacks the rigour commented in the general remarks above.

### 3.5 ESG 3.5/ENQA Criterion 4: Mission statement

*“The Agency should have clear and explicit goals and objectives for its work, contained in a publicly available statement.”*

*(p. 16) However, as mentioned before, there seems to be no systematic approach by the Agency to **achieve** its goals and objectives. Although **AQU has quite a clear mission** (statement), the responsibilities imposed by law are diverse and are translated into a variety of tasks AQU is supposed to fulfil. Given this fact, AQU has yet to more systematically **implement and operationalise its mission** and integrate the various activities within a coherent general framework. Thus, the review panel recommends that AQU should take steps for developing a more integrated system of external quality assurance and a clear policy and management plan, including when appropriate, all necessary details on the division of labour with relevant stakeholders in higher education.*

There is confusion in this paragraph between ‘having clear and explicit goals and objectives’ and the way these objectives are achieved, a matter that has already been evaluated in standards 3.1, Use of external QA procedures, 3.3, Activities, and 3.4, Resources.

*(p. 16) With this particular circumstance - the fact that law assigns such a wide variety of tasks to AQU without stating more precisely clear priorities between them – it may contribute to some blurring of AQU's missions image from some stakeholders' point of view, the Review Panel concludes that AQU is **substantially** compliant with this ENQA criterion.*

The content of criterion 4 is clear and explicit. We believe that AQU Catalunya, as justified in the SE report, “has clear and explicit goals and objectives for its work” and is therefore fully compliant with this criterion.

### 3.7 ESG 3.7/ENQA Criterion 6 & 8: External quality assurance criteria and processes

*The processes, criteria and procedures used by the agency should be pre-defined and publicly available. These processes will normally be expected to include:...*

*(p. 19) As far as the appointment of external reviewers is concerned, the proportion of non-Catalan experts in AQU's external reviews for 2006 was as follows: ProQU (pre-Bologna programmes) 38%, library services 57%, new master degree programmes 25%. There are plans to improve the situation in 2007, particularly with regard to the evaluation of new master degree programmes in which the number of non-Catalan reviewers will be approximately 50%. Out of a total of thirteen members of the CAQ, seven are from outside of the Catalan university community and three of them have always been leading experts within European agencies (EVA, CNE, QAA, etc). In the most recent reorganisation of CAQ, the viewpoints of one professional and one student were added.*



*The review panel recommends that since Catalonia has a relatively small HE-system, the number of reviewers coming from other regions in Spain and also from other countries should still be increased.*

Although we agree with this recommendation and, as pointed out in the report, AQU is in the process of increasing the number of reviewers from outside Catalonia, we would like to point out both the absence of references and the ambiguity of this recommendation: is the intention to achieve compliance with the criterion or to achieve a degree of excellence beyond this point?

*(p. 20) Regarding the interaction and synergy of the Agency's different activities there is still room for improvement: the lack of communication between the different working groups and the compartmentalization of their work mean that opportunities for shared learning and for rationalization of the work load may be missed.*

We again consider that the 'improvement' pointed out in this paragraph is orientated towards improvement beyond compliance. In any case, '*lack of communication*' should be read, as stated in the self-evaluation report, as '*failings in internal communication policy and development*'.