

COMMON POSITION OF THE AQU BOARD OF MANAGEMENT REGARDING THE SUBCOMMITTEE ON ADMINISTRATIVE DUPLICATION'S PROPOSAL MEASURE 1.07.004 FOR THE COMMISSION ON THE REFORM OF PUBLIC ADMINISTRATION (CORA).

The Board of Management¹ of AQU Catalunya expresses its total disagreement with proposal measure 1.07.004, together with its specific objectives, proposed by the Commission on the Reform of Public Administration (CORA report, November 2013), for the reasons set out below.

With regard to the objective defined in the CORA report that proposes the setting up of a “national (state) strategy in higher education quality assurance for the assessment of contract teaching staff and university degree programmes and awards”, the Board of Management of AQU Catalunya believes that:

- **This represents a regression in autonomy for the universities as regards university degrees** in that the aim of the measure is supposedly to avoid significant differences in the characteristics of any one degree entered in the Spanish Register of Higher Education Institutions, Faculties and Degrees (RUCT), regardless of the Autonomous Community (region) in which the degree is delivered. This intention contradicts the philosophy of the EHEA, as well as Spanish legislation, which places on the universities themselves the responsibility of producing degree curricula. The measure would appear to revert back to the pre-listed catalogue, and it would limit the universities as regards the possibility of their delivering courses and programmes that make best use of their innovative capability and that are capable of adapting to a demanding environment that is in constant transformation, at both local and international level, and on equal terms, like all other European universities.
- **It aims at putting the system of external review on an equal footing without taking into account the characteristics peculiar to each university system in the regional Autonomous Communities, which would thereby limit their development.** Instead of reducing any differences or helping to enhance quality, the establishment of uniform quality assurance (QA) criteria would, on the one hand, be detrimental to systems that need more time to adapt and, on the other, would curb those that, like the Catalan university system, can and want to achieve a higher threshold level in all areas that would be affected by the measure (assessment of teaching staff: establishment of the position of contract professor, or the Serra Hünter programme; degree programmes: implementation of the Framework for the validation, monitoring, modification and accreditation of recognised degree programmes, and the WINDDAT indicators system). Furthermore, the unification of criteria would inevitably imply the standardisation and bureaucratisation of QA processes, which could lead to the disappearance of the

¹ The Board of Management of AQU Catalunya consists of all the rectors of the public universities in Catalonia, three rectors from the private universities, all of the chairpersons of the boards of trustees of the public universities in Catalonia, representatives of the Executive Council of the Government of Catalonia (Generalitat de Catalunya) and academics of renowned standing in the Catalan university system.

continuous improvement-base approach that the Agency has established in all of its QA projects.

In the case of the second objective, “To bring together all QA competences into one agency, in a way similar to other European countries, to create a more uniform policy for quality assurance”, the Board of Management of AQU Catalunya is of the opinion that:

- **It proposes changing the regional Autonomous Community-based model into a centralised model, in which the regional agencies are subordinate to the national agency without any thorough comparative analysis being made of the existing models and ignoring their dynamics.** There are countries in Europe with a similar number of inhabitants to Catalonia (for example, Finland, Denmark and the Netherlands) that have one or more QA agencies, and others like Germany and Scandinavia as a whole, with more than 81 and 25 million inhabitants, that respectively have eight and four QA agencies. Europe does not therefore intervene in defining the model for external QA agencies that a country should have, whereas it has established standards and guidelines for quality assurance that have been endorsed by all of the member states, compliance with which is the guiding principle for the mutual recognition of decisions that are adopted.
- **It puts forward either the elimination of the regional Autonomous Community QA agencies or their conversion into regional delegations, at the same time that these agencies have obtained a better qualification than the national agency in terms of compliance with the European standards and guidelines.** AQU Catalunya was the first university QA agency to be set up in Spain, it is one of the most highly recognised agencies at international level (it is one of the co-founders of the European Association for Quality Assurance in Higher Education, ENQA), and it was also one of the agencies in Europe that obtained the best results as regards compliance with European standards, over and above the majority of European QA agencies and all of the Spanish agencies, including the national agency. It is surprising that the capability, experience and knowledge of AQU Catalunya should be undervalued when it has complied with national regulations on quality assurance and gone even further to establish a more advanced Catalan model that is connected to the needs and requirements of Catalan universities and which includes, amongst other things, a system of indicators that is exemplary in Europe, especially in the definition of the measurement criteria and the free availability of figures on employability on the part of the universities.

Lastly, as regards the aim to “Avoid any existing duplication in certain QA programmes and to optimise the cost of programme review with a more effective system that allows for lower costs”, the Board of Management of AQU Catalunya believes that:

- **It calculates savings of the proposal measure on the basis of a calculation methodology that is unsound, arbitrary and based on a total lack of understanding of the structure and different functions carried out by the different regional Autonomous Community QA agencies.** It mistakenly calculates the savings that

would supposedly result from the measure by taking as a reference the pattern and distribution of expenditure of ANECA, the national agency, according to the different review, certification and accreditation programmes, on the supposition that all other QA agencies in Spain have a cost structure that is identical to that of the national agency. The structure of AQU Catalunya has very little to do with that of ANECA, so a comparison is therefore necessary of the costs according to each QA performance report, including direct and indirect costs and the allocation of personnel costs for each QA performance report, to assess exactly which structure is the most efficient. According to the figures given in the CORA report, if a comparison is made with the actual data for AQU Catalunya and bearing in mind the number of QA procedures carried out by each agency, the cost of programme review and teaching staff assessment is approximately 25% lower than that of the national agency. Economically speaking, it is therefore a more efficient agency.

- **It overlooks the costs, and not just the economic costs, for a system that does not have an agency close at hand, together with those associated with a decrease in economic activity at local (regional) level.** In the case of the Catalan agency, the measure would see the absorption of the functions of programme review and university teaching staff assessment without taking into account at all the loss in value for the Catalan university system that would result from the cessation of the Catalan Agency's activities in relation to knowledge generation (such as the survey on the labour market outcomes/destinations of graduates, participation in the UNEIX information system, the building and maintenance of the WINDDAT indicators system, the student satisfaction surveys, the analyses of teaching staff assessment, the survey of employers on the subject of graduate labour market outcomes, etc.); internationalisation (AQU's hosting of the INQAAHE Secretariat, its participation in the international agencies ENQA and EQAR, its participation in international projects such as IMPALA, ISHLA, etc.) and cooperation with the universities and society in general in Catalonia. Furthermore, the simplicity of the proposed cost savings model fails to take into account the costs associated with travel expenses (in terms of both cost and time), accommodation, a more limited understanding of the university system, language (in the case of Catalonia), and the appointment of experts at local (regional) level (which would also need to be thoroughly analysed to assess whether the quality of the service would be the same).

In short, the Board of Management of AQU Catalunya considers that proposal measure 1.07.004 **stems from certain intentions of the Spanish government that have nothing to do with quality enhancement or helping the universities to develop all of their potential so they can compete in a globalised world, or the search for effectiveness or economic efficiency, or the building of the EHEA.**

The fact of centralising competences will not reduce the differences, and in the case of Catalonia this could be a dead weight for the development, internationalisation and competitiveness of its university system, and therefore for Spain and Europe as well. Trust and confidence in the quality assurance system will not increase because, if it were made uniform and homogeneous, it would be difficult to take into consideration, amongst other things, the

socio-economic and cultural context of a degree, the necessary specifics for improvement and enhancement or the promotion of guidelines that are indeed of real use. In no way does this action show that it really does promote the mobility of students, graduates or academic staff, as it claims it will achieve, let alone at European and international level.

The Catalan university system is one of the most important nodes of university activity with a solid reputation at international level in Spain, and AQU Catalunya is one of the instruments that deals with the demands that this makes on it. Moreover, it does so with a budget that is in line with or lower than that of European agencies that operate in university systems that are of a similar size to the one in Catalonia.

Having an agency that is well-connected with the local setting, and one that is at the same time recognised at international level, is one of the things that make up university systems of excellence. The Catalan university system does not want to renounce this because having its own agency in Europe means having its own model that enables the universities in Catalonia to compete in the changing environment, and Catalonia wishes to maintain its agency so it can develop on equal terms.

For all of the above reasons, **the Board of Management of AQU Catalunya requests that its position regarding all of this, together with the accompanying explanatory memorandum, be referred to the Executive and representative bodies of the Generalitat de Catalunya, in order for them to take appropriate measures so that the university model in Catalonia is recognised and reinforced at both national and international level, where the Agency should continue to have a relevant role.**

The Board of Management also requests AQU Catalunya to make its position public using the instruments of communication that it has in order to share with the university community in particular and with society in general the harm that this proposal could lead to if it were to come to fruition.

Barcelona, 17 December 2013

MEMORANDUM

1. AQU Catalunya: an agency of both national and international renown

AQU Catalunya was the first quality assurance agency to be set up in Spain (1996), or prior to state legislation concerning the need for QA agencies to be set up, and was a response to the commitment of Catalan universities catalanes and the Generalitat de Catalunya to the quality assurance and enhancement of the university system in Catalonia. It is at the present time the main instrument for the promotion and assurance of quality in the Catalan university system.

AQU Catalunya was one of the founder agencies as well as being a current full member of the European Association for Quality Assurance in Higher Education (ENQA, 2000); it was one of the first agencies to be registered with the European Quality Assurance Register for Higher Education (EQAR, 2008); and the outcomes of the international external review (2012) have seen it become one of the best agencies in Europe in terms of compliance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area, approved by the ministers responsible for higher education in Europe (2005).

AQU Catalunya is also a member of the International Network for Quality Assurance Agencies in Higher Education (INQAAHE, 1998), for which it currently hosts the network's Secretariat for a renewable period of two-and-a-half years (2013-2015). It was also a founder member of the Spanish body that brings together all higher education QA agencies (Red Española de Agencias de Calidad Universitaria/REACU, 2006) and it forms part of the European Consortium for Accreditation (ECA, 2009). It was the first European QA agency to be certified with ISO standard 9001 (2000).

In AQU Catalunya, therefore, Catalonia has a QA agency with a strong, consistent and rigorous track record, which has made it into a university QA agency with a solid reputation at international level.

2. AQU Catalunya: main contributions

AQU Catalunya has been and is an innovative agency that has generated numerous contributions for the Catalan university system, many of which have been subsequently adopted at national level. The Agency has carried out pioneering work in the following:

- The development of QA methodologies, since 1996 to the present day, and integration of the validation, monitoring, modification and accreditation of study programmes in the building of a consistent, enhancement-based external QA system.
- Participation, together with the Catalan universities and the Government of Catalonia, in the setting up of the UNEIX database and in the use of indicators to analyse the running and delivery of university degree programmes, which, as of 2012, can be consulted through the WINDDAT application (<http://winddat.aqu.cat/>).

- The carrying out of studies and surveys on the labour market outcomes/destinations of university graduates since 2001. It is currently involved in the student satisfaction survey and the employers survey.
- Institutional (faculties) and programme review, as well as the assessment of teaching staff prior to recruitment (pre-selection) and the assessment of merits.
- The development and application of the teaching assessment handbooks, a forerunner of the (national) DOCENTIA programme, since 2003.
- Instrumental in developing internal quality assurance systems in Catalan universities, through the AUDIT programme, since 2007.
- The undertaking of studies and the development of tools to support the quality enhancement of the university system (general frameworks, guides to skills and competences, guides for designing curricula, etc.).

3. AQU Catalunya: expenditure pattern 2013

The budget for AQU Catalunya in 2013 was €2,783,820.56², the distribution of which was as follows:

Strategic tools (that encompass all of the activities of AQU Catalunya)	Total budget 2013 (personnel expenses and operating expenses distributed according to the Agency's main areas of activity)
I. Programmes of study	984,295.84 €
II. Quality of teaching staff	711,629.13 €
III. Knowledge generation	482,285.26 €
IV. Internationalisation	208,529.56 €
V. Strategic management and communication	397,080.77 €
Total	2,783,820.56€

In this distribution, personnel costs have been allocated to the respective projects and the organisation's operating costs distributed as indirect costs proportional to each main area of activity.

In the CORA report, €2,241,122.53 has been allocated to Catalonia for programme review and teaching staff (I & II), whereas €1,695,924.97 was actually allocated by AQU Catalunya as indirect costs and personnel, i.e. 25% less.

With the closure of accounts for 2013, costs will be thoroughly calculated for each QA performance report. As an estimate, in the case of programme validation and modification in 2013, the cost per QA performance report will be around €1,900, and in the case of teaching staff it will be around €350 (according to the type of assessment). According to the ANECA

² This budget is dated 1 December 2013, so these figures may well change with the closure of accounts for the year.

budget that appears in the CORA report and taking into account the number of programmes reviewed by the national agency, the average costs for their QA processes are approximately 25% higher than those of AQU Catalunya.

4. The QA agency model in Europe

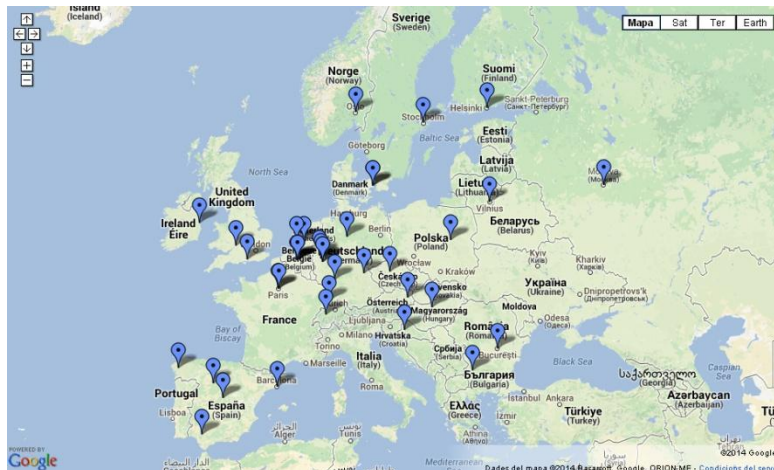
With regard to the process of concentrating QA agencies, there are countries, for example, Germany, that has more than eight agencies that are members of ENQA; France and the Netherlands both have two. This can be consulted at <http://www.enqa.eu/agencies.lasso> and <http://www.eqar.eu/register/map.html>.

There are ten countries in the European Union³ with less population than Catalonia⁴ with a full member agency in ENQA and/or registered with EQAR (for example, Bulgaria, Serbia, Denmark and Finland).⁵ Twelve more have an agency affiliated with ENQA (for example, Greece, Khazakstan, Slovakia and Cyprus).

Furthermore, twelve countries⁶ with a GNP lower than that of Catalonia⁷ have one full member agency at ENQA and/or registered with EQAR (for example, Finland, Greece, Portugal and Ireland), and nine more have an agency affiliated with ENQA (for example, Slovakia, Bosnia and Herzegovina, Albania and Macedonia).

If one takes per capita GNP, the number of signatory countries with a full member agency in ENQA and/or registered with EQAR that are below Catalonia is increasing notably (approximately thirty).

It is also interesting to see the geographical distribution of the QA agencies around Europe.⁸



³ Source: Eurostat (<http://epp.eurostat.ec.europa.eu/portal/page/portal/eurostat/home/>).

⁴ Source: Idescat (<http://www.idescat.cat/>).

⁵ For the countries not belonging to the European Union, the source is UNdata (<http://data.un.org/>).

⁶ Source: OCDE (<http://www.oecd.org/>).

⁷ Source: Idescat (<http://www.idescat.cat/>).

⁸ Source: <http://www.enqa.eu/index.php/members-area/members-interactive-map/>.