

Consistency of Reviews Across the EHEA

Results from an empirical data analysis prepared by A3ES

REFLECTING ON THE FUTURE OF EUROPEAN QUALITY ASSURANCE

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European agencies

ENQA - The European Association for Quality Assurance in Higher Education is an **umbrella organisation which represents its members** at the European level and internationally

EQAR - The European Quality Assurance Register for Higher Education (EQAR) is the **EHEA's official register of QAAs**, listing those that substantially comply with the ESG.

AKKREDITIERUNGSRAT – German accreditation council, frequently used by German speaking agencies for their external reviews (replacig ENQA)

Decisions ENQA/EQAR



Activities of agencies and the scope of ESG

- To the EQAR not all the agencies' activities fall under the scope of the ESG. Examples include:
 - External QA outside the scope of the ESG
 - Consultancy activities –*in so far as these do not include evaluation and review activities* of higher education institutions and programmes
 - However, **decisions on what can be classified as consultancy are not always clear**

	External quality assurance: • Predefined process • Typical terminology (ESG 3.1)	Other types of activities: • Individual demand-driven • Other terminology
<ul style="list-style-type: none"> Subject : teaching and learning in HE incl. learning environment and relevant links to research & innovation Object : HEI, department, faculty, programme, etc. 	External QA within the scope of the ESG	Consultancy and equivalent activities
<ul style="list-style-type: none"> Subject : other matters than teaching and learning in HE, other education sectors Other object [e.g. individual staff] 	External QA outside the scope of the ESG	Other activities

Overall Results

- 49 cases were analysed: ESG2015 from 2016 to 2020
- 132 judgement decisions (negative) were considered
- Of those decisions ENQA and EQAR only concurred in 46 cases (34.8%)
- Of the 86 non-concurrent decisions those of EQAR were less favourable in 80 cases and more favourable in 6 cases.
- However, in 4 of those 6 cases the agency, following the ENQA panel's review recommendations, had already introduced changes in answer to them.

Agency	Year	2.1	2.2	2.3	2.4	2.5	2.6	2.7	3.1	3.2	3.3	3.4	3.5	3.6
BAC	2020						S/P					P/P		
MusiQuE	2020						F/P	S/P						
AAC-DEVA	2020						F/P	S/P	P/P					S/P
ACSUCYL	2020								S/P		F/P			
Madrid+d	2020						F/P							F/P
ACSUG	2020							S/P			F/P	P/P		
AHPGS	2020	P/P			S/P							N/P		
NPCA	2020		P/P					P/P						
VLUHR QA	2020	S/P										P/P		
A3ES	2019				S/P									
CTI	2019					P/P	P/P							
CYQAA	2019							S/P			S/P	N/S		
evalag	2019		S/P						S/P					
QQI	2019			S/P										
Unibasq	2019						S/P	S/P	S/P					
NCEQE	2019							S/P				S/P		
PKA	2019				P/P		P/P						S/P	
QANU	2019				S/P									
HAC	2019				P/P			S/P			F/P	S/P		
IEP	2019			S/P							F/P			
SQAA	2019						P/P					P/P		P/P
QAA	2019				S/P				F/P					
AIC	2018							P/P						

F – full compliance
S – substantial compliance
P – partial compliance
N – no compliance

X/Y – ENQA/EQAR

Yellow – EQAR ‘more rigorous’
Red – ENQA ‘more rigorous’

Agency	Year	2.1	2.2	2.3	2.4	2.5	2.6	2.7	3.1	3.2	3.3	3.4	3.5	3.6
NEAQA*	2018		P/P	P/P	P/P		P/P	P/P	P/P		S/P			
NOKUT	2018	F/P		P/S	F/P			F/P						
ANECA	2018						S/P		F/P					
EAEVE	2018	P/P				P/P	S/P							
NEAA	2018						S/P	S/P	S/P					
SKVC	2017							S/P					S/P	
AQUCatalunya	2017						S/P				S/P			
NVAO	2017						S/P							
QANU*	2017				S/P			S/P	P/P			P/P		
FIBAA	2017						P/P	S/P						
AEQES	2017												P/P	
ANQA	2017			F/P		S/P	F/P	S/P						
AQAS	2017					P/S			S/P					
ASHE	2017					P/P	S/P	P/P						
ASIIN	2017			S/P					S/P			P/P		
FINEEC	2017							F/P				P/P		
H CERES	2017			P/P	P/P	P/P		P/P						
IAAR	2017		S/P					P/P						
ECCE*	2017					P/P		P/P	S/P		S/P	S/P	S/P	P/P
IQAA	2017	S/P	P/P			S/P	P/P					P/S		
ACPUA	2016											S/P	S/P	
ACQUIN	2016			S/P	S/P	S/P						P/P	P/S	
AI	2016		P/S				S/P	P/P	P/P					
ZEvA	2016						P/P	P/P						P/P
AAQ	2016			S/P			S/P	S/P						
MusiQuE	2016								S/P				P/P	
		5	6	9	11	9	22	23	14	0	8	14	6	5

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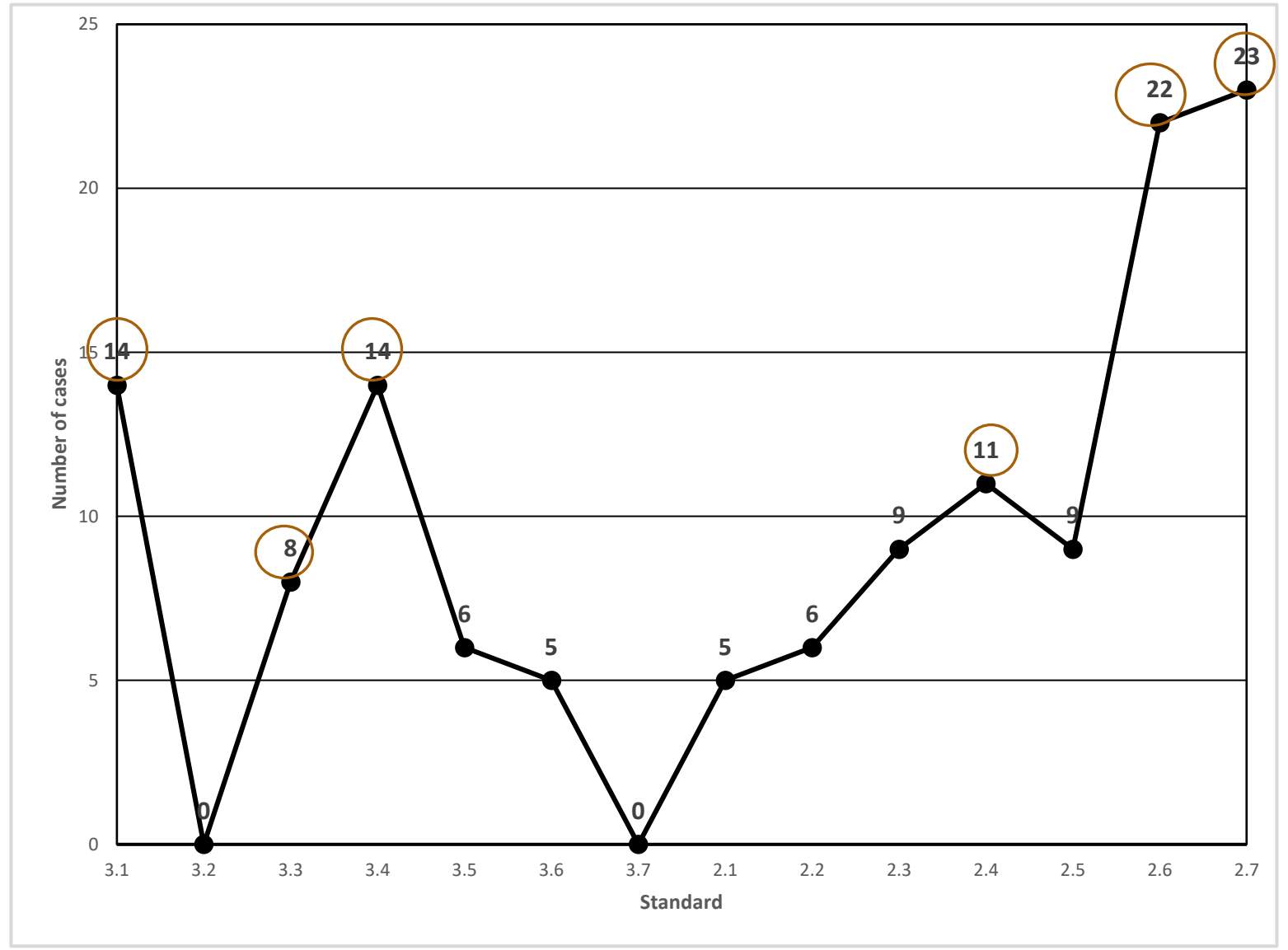
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- 132 judgement decisions (negative) were considered

- Most critical ESG

- ESG 3.1
- ESG 3.3
- ESG 3.4
- ESG 2.4
- ESG 2.6
- ESG 2.7



Standard 3.1 – Activities, policy and processes for QA (14 cases)

The **activities of QA Agencies** were a matter of significant disagreement between ENQA and EQAR, with the latter having a **more strict view of what falls within the scope of ESG**.

EQAR had a **restrictive view on what constitutes consultancy services** and imposed the use of ESG even when a European QA agency collaborated with institutions or governments outside the EHEA, which might create substantial problems to Agencies.

Standard 3.4 –Thematic analysis (14 cases)

Some nonconcurrent decisions were observed under standard 3.4. In 3 cases **ENQA was less favourable than EQAR** .

In 2 of those 3 cases (AHPGS and CYQAA) the **Register Committee took in consideration changes introduced by the Agency in answer to ENQA panel’s recommendations.**

In the third case (IQAA) the agency does not analyse the results from institutional and programme reviews. IQAA explained that it did not interpret standard 3.4 to explicitly require analyses based on external review reports, but agreed on the importance of these findings and has published a number of studies based on expert panel review reports on institutional accreditation.

Standard 3.3 – Independence (9 cases)

In a number of cases the EQAR committee did not concur with the opinion of the ENQA's review panel that the reviewed agency was in full or substantial compliance with the standard.

Most cases were observed for Spanish regional accreditation agencies. EQAR considered that **the legislation did not protect the Agency from the interference of local authorities.**

In other case the Register Committee noted that there **was lack of clear safeguards to prevent possible** (even if unlikely based on experience to date) **interference** in the activity of the agency or in the dismissal of its Board members.

Standard 2.7 – Complaints and appeals (23 cases)

EQAR considered that in a number of Agencies the **composition of the Board of Appeals did not ensure its independence.**

In one case the **short term of the members** of the Board did not ensure they gain a broad overview of the decisions made.

In yet another case the Appeals Committee **could make recommendations but no binding decisions.**

In several cases the agency did not have a **clear, structured and effective complaints process.**

Standard 2.6 – Reporting (22 cases)

EQAR makes a **rigid interpretation** of this standard considering that **all full reports by the experts should be published**. However, several agencies publish all reports except those from ex-ante evaluations that results in a negative accreditation decision.

But what is the fundamental objective of QA? Improvement or accountability? Shouldn't agencies also protect HEIs good name?

Standard 2.4 – Peer review experts (11 cases)

Lack of student participation was a recurrent theme throughout the deliberations of EQAR and even of ENQA. The ESG only considered mandatory the presence of students in the external review teams. However, even in ENQA reports, there were recommendations to include students in the decision-making bodies of QA agencies.

What is the **role of students** in the prior accreditation of **new study programmes**? No classes;
No students!

In Brief...

- There is **interference** with the agencies' activities, even if they take place outside the EHEA or if they refer to strict consultancy activities.
- **Agencies are not always clear about the nature of their activities.** Lack of clear terminology (evaluation, review, audit, assessment or accreditation)
- An eventually **excessive emphasis on the universal presence of students** even when their presence does not contribute to added value.
- **Excessively rigid interpretation of the ESG**, which may compromise the enhancement purpose of QA

Interpretations of the ESG – new version 2020

EQAR has produced a new version of its interpretation of the ESG. This new version incorporates changes resulting from observations taking into account the experience gained from the analysis of reports produced under ESG2015.

In this new version EQAR recognises that “the guidelines themselves are not requirements”.



Use and Interpretation of the ESG for the European Register of Quality Assurance Agencies

Register Committee
September 2020

1. Introduction

The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015) provide the European framework against which the quality assurance agencies (QAAs) and their activities are assessed.

Ref. RC/12.1
Ver. 3.0
Date 04/09/2020
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Interpretations of the ESG – new version 2020

Programme

- Broadest sense, including online and blended learning

ESG apply to all HE

- “... including transnational and cross-border provision”

More flexibility

- Case of activities performed as subcontractor

Non-European HEIs

- If they look for an European label, then agencies should work in compliance with the ESG

Clear terminology

- Avoid confusion if and when agencies use the typical terms “evaluation”, “review”, “audit”, “assessment” or “accreditation”

Other activities

- ESG type vs. Non-ESG type (e.g. consultancy) activities
- Grey areas exist, but agencies need to be clear

Final Remarks

The issue of **non-concurrent decisions**: is it **really an issue**?

It is somehow problematic that **two different decisions** can be made **based on the results of the same review!**

- **Differences in ESG interpretations by ENQA and EQAR** should be made **clear to the agencies and the review panels** – dissemination of 2020 ESG interpretation by EQAR among review panels and agencies + ENQA' own interpretation of the ESG?

OR

- Should **ENQA** and **EQAR** come to a **shared interpretation of the ESG**?

Final remarks



Would it be a solution for the future that **EQAR would cater for QA as compliance** while **ENQA would foster the development of mechanisms able to contribute to the enhancement of QA agencies' practices?**