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# INTERNAL QUALITY ASSURANCE BENCHMARKING

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DOUGLAS BLACKSTOCK, NADINE BURQUEL, NÚRIA COMET, MATTI KAJASTE,  
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HARALD SCHEUTHLE, LUIS CARLOS VELÓN SIXTO

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WORKSHOP  
REPORT

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# FOREWORD

In June 2002, ENQA organised a workshop about Benchmarking in Higher Education in Finland, and produced the second Workshop Report entitled *Benchmarking in the Improvement of Higher Education*. Almost ten years later and in the same country, ENQA held its fifth annual Internal Quality Assurance Seminar on benchmarking in internal quality assurance of agencies. This demonstrates that benchmarking is still considered as an interesting subject to promote.

In an increasingly competitive higher education sector, benchmarking is a modern management tool to support strategic decision-making, yet its use is still too limited. In June 2011, the annual seminar of the ENQA IQA Group thus focused on the theme of *Learning from each other – using benchmarking to develop IQA*.

Agencies involved in the IQA Group were invited, in small groups, to compare practices and expertise in their agencies as well as common challenges encountered in their daily operations.

The report presents a general overview of the benchmarking theme and discusses common features and differences of the benchmarked agencies' IQA activities in terms of the selected three themes: performance indicators, follow-up on feedback and staff competence/development. The report also puts forward the benchmarking partners' views on strengths, weaknesses and recommendations for development of each other's activities, as well as the good practice they have identified on the selected theme.

ENQA fully supports and encourages the open sharing of good practice and challenges among its membership in order to improve both internal and external processes.

I hope that this publication, illustrating how collaborative benchmarking can be applied in higher education and can benefit quality assurance agencies, will be of interest and use to agencies in contributing to the enhancement of their internal quality assurance.

**Achim Hopbach**

*President*

European Association for Quality Assurance in Higher Education (ENQA)

# INTRODUCTION

The Internal Quality Assurance group of ENQA (IQA Group) has been organising a yearly seminar for its members since 2007. Staff members involved in IQA of all ENQA members can join the activities of the Group. The main objective is to share experiences concerning the internal quality assurance of work processes in the participating agencies. The Group is coordinated by a Steering group (SG), consisting of five members. The composition of the Steering group changes gradually by election of one or two members every year.

The overarching theme of the 2011 seminar was how to use benchmarking as a tool for developing an agency's internal quality assurance system. The seminar gathered around 45 participants in the premises of the Finnish Higher Education Evaluation Council (FINHEEC) in Helsinki on 16-17 June 2011.

"Benchmarking involves comparing different aspects of the work of a group of organisations. It can be a very flexible approach. You can compare services, products or processes; you can look at a wide range of issues or focus on areas of concern; and you can benchmark with similar organisations or take a cross-sector approach on common issues such as customer care. Benchmarking may take place as a one-off exercise or be an ongoing relationship. The benchmarking exercise should be a mutually beneficial relationship, with every organisation in the benchmarking group being able to learn and develop from the experience of others."<sup>1</sup>

The Steering group based the preparation of the benchmarking activity on this definition. Agencies which are similar to each other, i.e. in size or scope, were grouped in pairs or triplets. Each group included an agency member of the Steering group. They compared their own practice with others on a certain focus area before the seminar, between January and May 2011. In addition to good practices, the participating agencies were encouraged to openly share which processes they find challenging or ineffective in their agencies. The findings were presented in the IQA Seminar in June 2011.

The benchmarking exercise focused on the following areas:

- Benchmarking of performance indicators (with FINHEEC)
- Benchmarking of on the follow-up of feedback (with ACSUCYL)
- Benchmarking of staff competence/development (with NVAO)

The present report gathers good practise and expertise related to these three themes: follow up on feedback (chapter 2), staff development (chapter 3) and performance indicators (chapter 4). The first chapter of the report provides a general overview of the benchmarking theme and is based on the keynote speech given by Dr Nadine Burquel.

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1 Source: The Institute of Chartered Secretaries & Administrators (ICSA), Charity trustees guide

## CHAPTER 1:

# BENCHMARKING IN EUROPEAN HIGHER EDUCATION

*Nadine Burquel, European Centre for the Strategic Management of Universities (ESMU)*

## INTRODUCTION

Collaborative benchmarking is a valuable modern management tool for organisations eager to steer their institutional developments in a strategic way. It involves a process of target setting by the institutions themselves looking to increase their performance through inter-organisational learning.

This article focuses on benchmarking in higher education. It starts with an outline of the origins of benchmarking and provides a brief review of the literature. It explains how benchmarking can be applied in higher education. A number of suggestions are then made on how quality assurance agencies could benefit from the practice of collaborative benchmarking. The article is based on the findings of a EU-funded project (DG Education and Culture) *Benchmarking in European Higher Education* carried out from 2006 to 2011 (Phases I and II) by a consortium led by the European Centre for the Strategic Management of Universities (ESMU)<sup>2</sup>.

## THE ORIGINS OF BENCHMARKING IN HIGHER EDUCATION

Benchmarking originated in the private sector in 1979. In a context of severe financial difficulties, Xerox Corporation started using benchmarking to try to understand why competitors were performing better. This process led to major changes to improve internal processes and enabled the company to regain a strong market position. Since then, benchmarking has been widely used in industry, manufacturing, finance, transport, logistics, retail and services.

In the public sector, with the development of new public management, benchmarking has been increasingly used in the health sector, the public transport sector, in local and regional administrations and the like. At the European level, mechanisms have been developed to benchmark labour market policies, Europe's industrial competitiveness or public transport systems.

Major changes have taken place in European higher education, resulting in higher education institutions having to enhance their attractiveness on the market and profile themselves much more strategically. Quality is a key to support these developments, and in this context, enhancing university performance through strategic management becomes crucial. However, systematic data collection on institutional performance to inform decision-making is still lacking in many higher education institutions.

The purpose of quality assurance is to ensure accountability, yet it must also enhance the quality of higher education itself. *The standards and guidelines for quality assurance in the European higher education area (ESG)* provide directions for higher education institutions to improve their internal quality assurance policies and procedures, yet there is often a perception that European quality assurance has become too bureaucratised, failing to lead to real, deep changes in the sector. Not all higher education institutions take sufficient ownership in the process.

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2 [www.esmu.be](http://www.esmu.be)

Some implicit forms of benchmarking have always been part of higher education with various forms of peer review and site visits. What is new is the use of explicit benchmarking and the formalisation of processes. The growth of benchmarking in higher education reflects the search for continuous quality improvement and more effective ways of improving performance in an increasingly diversified higher education sector.

The concrete nature of benchmarking as a self-improvement tool to improve organisational performance is not always fully understood. Benchmarking is often performed as a mere data gathering exercise lacking a systematic approach and target setting for institutional improvement.

Benchmarking relates to other transparency tools such as classifications and rankings. With a focus on descriptive indicators, classifications make it possible for higher education institutions to identify adequate institutional partners with similar profiles for benchmarking exercises, thus leading to more relevant comparison between institutions. Reliable rankings can be at the starting point of benchmarking exercises for those institutions willing to increase their performance in the rankings.

## REVIEW OF THE LITERATURE

In the first phase of our EU-funded project *Benchmarking in European Higher Education*<sup>3</sup>, we compiled 150 articles and references on benchmarking. Our first practical guide *Benchmarking in European Higher Education* (2008) produced a review of this literature.

The enormous literature on benchmarking in higher education focuses mainly on the practice of benchmarking. The term is used for different practices from the comparison of statistical data to the detailed analysis of processes within institutions. Publications focus either on the character of benchmarking (i.e. an exercise focusing on institutional processes or on performance) or on the aim of the benchmarking exercise (to learn to improve internal processes or to improve one's competitive position).

Stressing the wide range of diversity between higher education institutions, Yorke (1999:91) claims that there "can be no single reference point for the purposes of benchmarking".

Alstete (1995) defines four types of benchmarking linked to the voluntary participation of institutions, i.e. international benchmarking, external competitive benchmarking, external collaborative benchmarking and external trans-industry (best-in-class) benchmarking.

In *Benchmarking in Higher Education, An international review*, Schofield (1998) points to the difficulties with the definitions by highlighting that "the term can vary considerably between different approaches and practitioners, causing problems to institutions investigating the subject for the first time".

UNESCO-CEPES (2007) uses similar descriptions referring to internal benchmarking, external competitive benchmarking, functional benchmarking (comparing institutional processes), trans-institutional benchmarking (across multiple institutions), implicit benchmarking (quasi-benchmarking looking at the production and publication of data/performance indicators), generic benchmarking (looking at basic practice process or services) and process-based benchmarking (looking at processes by which results are achieved).

In its report *Benchmarking in the Improvement of Higher education* (Hämäläinen Kauko et al., 2002), ENQA attempts an understanding of the principles of true benchmarking. A long list of 32 attributes is given to benchmarking, the main ones being collaborative/competitive, qualitative/quantitative, internal/external, outcome-oriented or experience-

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3 [www.education-benchmarking.eu](http://www.education-benchmarking.eu)



seeking, with various purposes (standards, benchmarks, best practices) and interests (to compare, improve, cooperate), depending on the owners of the benchmarking exercises. The report concludes that “good instruments are needed for useful benchmarking exercises” and that “current benchmarking methodologies in Europe must be improved”.

## **THE DEVELOPMENT OF COLLABORATIVE BENCHMARKING**

We identified two types of benchmarking approaches in higher education. In the first non-collaborative type, higher education institutions call on consulting firms to buy data to compare their performance with other institutions. In the second type, benchmarking is carried out in a collaborative way as an inter-organisational learning process between institutions with a view to improving their modes of operation. This second approach requires a high level of trust and confidentiality between participating institutions.

In Europe, collaborative benchmarking approaches in the higher education sector have developed from the mid-nineties as initiatives launched at the national level by groups of institutions or by independent bodies. These have usually only involved a small number of institutions. Transnational level exercises have so far remained limited.

In our first benchmarking project, we analysed 18 collaborative benchmarking groups worldwide in Europe, Australia, and the United States.

We identified the following 13 criteria:

- institutional nature;
- group character (homogenous or heterogeneous);
- management (self-steered group or group managed with the support of an external moderating organisation);
- group size;
- group membership;
- membership fees;
- performance-based nature (or not);
- timeline;
- geographical scope;
- methodology (quantitative or qualitative exercise);
- focus (input, output, process);
- level of participation;
- dissemination of outcomes.

We did not manage to identify specific models to characterise these benchmarking groups. Benchmarking groups all vary by aims, objectives, structure and methodology. Many groups struggle to find the right facilitator and lack appropriate human, technical, and financial resources. Even the most successful initiatives do not sufficiently make use of the results for decision-making purposes back in participating institutions.

Building on this analysis, we defined benchmarking as *the process of self-evaluation and self-improvement through the systematic and collaborative comparison of practice and performance with similar organisations in order to identify strengths and weaknesses, to learn to adapt and to set new targets to improve performance.*

This approach was adopted at the beginning of the second phase of our EU-funded benchmarking project which involved 41 European universities, divided in four groups on university governance, lifelong learning, curriculum reforms and university-enterprise cooperation. The outcome was a handbook titled *Benchmarking in European higher education.*

Benchmarking requires senior leadership commitment and willingness to improve institutional performance, a clear understanding of processes, reliance on a strong peer group and the commitment of financial and human resources to support the implementation of the exercise. Benchmarking involves six stages:

- Strategic decision-making;
- choosing appropriate partners;
- defining priorities/focus and indicators;
- data gathering and reporting;
- developing action plans;
- monitoring results.

The most effective benchmarking exercises are with partner institutions of a similar profile sharing a common interest and a similar degree of development in a given area.

It is crucial that the benchmarking group agrees on common priorities based on which a list of performance indicators can be developed. Depending on the nature of the benchmarking exercise, there will be a stronger focus on qualitative or quantitative indicators, or on input, process, output or outcome indicators. A full benchmarking cycle requires all types. The sets of indicators get final agreement from the senior leadership of each participating institution.

There is also an agreement on what constitutes good performance with four “expertise levels”: basic performance, standard performance, good and excellent performance.

Once the priorities and indicators have been defined, the data gathering can start. The question is how much data should be gathered and how to ensure their validity and reliability. The group may wish to use external experts for this purpose. Once the data have been gathered, institutions are placed and scored against the “expertise levels”. The comparative scorecards combining the individual university scores show current performance and provide indications on where individual institutions should place the precise focus for their strategic improvement plan. From a collective exercise the process becomes very individual with institutions drawing their own realistic action plans to address the gaps identified around a pilot project with a precise timeframe, specific tasks, and adequate financial and human resources.

## **HOW CAN QUALITY ASSURANCE (QA) AGENCIES BENEFIT FROM BENCHMARKING?**

Quality assurance agencies can gain significantly from comparative benchmarking exercises to assess the effectiveness of their activities in responding to the improvement of quality in higher education at the national and European levels.

Such benchmarking exercises between QA agencies would require the preliminary identification of specific priority areas and the choice of relevant partner agencies (i.e. with similar interests, activities and areas of institutional development).

The data gathering, analysis and reporting would lead to comparative overviews of the agencies’ performance, based on which action plans with targets for improvement can be defined.

Benchmarking is a structured and collaborative learning experience which would help QA agencies identify and disseminate good practices and develop new ways of addressing specific problems. Such inter-organisational learning between QA agencies within the context of ENQA would enhance their reputation in demonstrating a continuous effort to improve the way in which quality assurance is performed in Europe.

Benchmarking exercises could also be used to create databases of good practices to support the implementation of the European Standards and Guidelines, to review QA agencies' procedures from the point of view of their adequacy to the quality agenda set in the context of the Bologna Process. It would help support newly established QA agencies with their work.

## **CONCLUDING REMARKS**

In an increasingly competitive higher education sector, benchmarking is a modern management tool to support strategic decision-making, yet its use is still too limited.

Whether carried out within or between institutions, benchmarking must always lie in the identification of strengths and weaknesses with a view to set targets for improvement. Benchmarking goes beyond the comparison of statistical data. It is a dynamic comparative exercise during which relevant indicators are defined, and against which the performance of a group of institutions can be measured.

Benchmarking must be implemented at the strategic level to support strategic developments. It will only produce valuable results if placed in the context of organisational transformation and progress. The key is to define where efforts should be placed to maximise results and constantly set new targets for institutional improvement.

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## CHAPTER 2:

# LEARNING FROM EACH OTHER - USING BENCHMARKING TO DEVELOP IQA. FOLLOW UP ON FEEDBACK

**Sandra Marcos, Quality Assurance Agency for the University System in Castilla y León (ACSUCYL)**

## INTRODUCTION

With a view to sharing the information and pinpointing the good practices which Quality Agencies for Higher Education carry out concerning the processing and follow-up of information gathered from stakeholders, the possibility was considered of conducting a joint benchmarking exercise involving any member agencies of the IQA group who might be interested.

Three agencies expressed an interest in taking part: AEQES (l'Agence pour l'Evaluation de la Qualité de l'Enseignement Supérieur de la Communauté française de Belgique), VLIR (Vlaamse Interuniversitaire Raad) and OAQ (Swiss Center of Accreditation and Quality Assurance in Higher Education).

These three agencies, together with ACSUCYL, a member of the IQA Steering Group and project coordinator, worked on the project for three months, which was concluded with the presentation of the results to emerge subsequent to an analysis of the relevant data, at the annual seminar organised by the IQA Steering Group.

The goal of the exercise was firstly to reflect on whether the information we gather both internally as well as externally actually proves useful and valuable for the organisation and whether the tools used to gather said information are the most appropriate. Secondly, the goal of the exercise was to ascertain whether this information actually helps to improve the quality of the activities that the agencies carry out and, if so, to what extent and what tools are used to verify this.

With these goals in mind, the four participating agencies got down to work. The initial stage involved exchanging information concerning how each agency worked as well as various aspects related to the issue the activity was concerned with. As a starting point for exchanging information, agencies responded to the following questions:

- What methods do you use to collect information to get feedback? How do you use that information?
- From whom do you collect feedback?
- What are the strengths and weaknesses of these methods?
- How are you thinking of developing these methods?
- Do you feel the information is really useful for improving the quality in your agency? Do you make a real follow-up on how the information has helped your organisation to improve? If so, how?

Once the various agencies had responded to the above questions, an analysis was carried out, first individually and later jointly, in an effort to pinpoint similarities and differences

which, in certain instances, were due to the areas each agency was involved in as well as the scope, mission and structure of each.

In all, three meetings were held where the information provided by each agency and how they conducted their business were discussed. To conclude the exercise, and with a view to preparing the presentation to be given at the IQA seminar, the following questions were addressed:

- What are the similarities and differences between the agencies involved in benchmarking?
- What new ideas did you learn from this exercise?

After the presentation at the seminar, several working groups were set up in order to give the participants a chance to express their opinion concerning the issue at hand, as well as to exchange good practices and share their concerns.

Most of the information contained in the present article has been taken from the conclusions reached by the working groups comprising the four agencies and the working groups at the seminar.

## **DEVELOPMENT**

The key to obtaining useful, accurate and valuable information lies in the agency's ability to have a clear idea of what kind of information is required, how it may best be obtained, who can provide it, and of course what is the final goal being pursued.

It should be highlighted that most quality agencies for higher education use satisfaction surveys as a means of collecting information. These are sent periodically to stakeholders involved in the activity in question, and the feedback obtained helps in decision-making concerning the processes conducted and in general regarding the services provided.

Yet, despite being the most commonly used approach, it is by no means the most efficient nor the most highly regarded. The fact that surveys are conducted anonymously is usually felt to be a positive aspect. However, unlike other methods, the *limited* nature of the questions does not allow for possible interaction with respondents nor does it lead to any discussion from which useful ideas may emerge.

Some agencies organise focus groups. This method seems to be more efficient as the information gathered is more accurate, reliable and less biased. Some agencies even employ both methods, the responses obtained through the satisfaction surveys subsequently being analysed by focus groups.

Another commonly used tool is meetings, both at formal and informal level. In this respect, the general feeling is that internal communication within the agencies themselves needs to be strengthened. In many instances, internal feedback is deemed more valuable than external feedback.

*Meta-evaluation* was highlighted as one useful means of analysing information about processes. This involves appraising all the information related to an evaluation process with a view to pinpointing improvements to be implemented in the future.

Other means of gathering information included seminars, congresses, etc.

The kind of question posed in an effort to gather information was seen to vary greatly, although participants all agreed that one of the most relevant, and at the same time probably one of the most complex question concerns the impact of evaluations on the education system.

The analysis conducted by the working group revealed that satisfaction surveys were used for stakeholders most closely involved in the agency's activities. However, for those

who were not so closely involved, other tools such as informal meetings, seminars, and discussion groups were used to gather information.

One problem all participants face emerges when they need to identify from whom the information should be collected. It is clear that evaluators involved in the evaluation processes, as well as those requesting assessment, whether they are universities or private individuals seeking evaluation in addition to students, need to be surveyed, although not all agencies do indeed survey students. There is, however, a general feeling that not all of those whose opinion should be sought are actually surveyed. In most cases, this is due to the difficulty involved in pinpointing who should be surveyed amongst the particular groups such as society at large, or workers. However, difficulties may arise simply because of the problems related to interviewing certain authorities who, strangely enough, are in many cases responsible for taking the key decisions.

This ties in with one of the challenges highlighted by the working groups concerning agencies' independence when undertaking changes. One of the issues that emerged during the presentation was the difference between the various agencies when it came to dealing with the changes to arise as a result of feedback. Various levels of independence were identified with regard to making changes, depending on whether these are internal or external. The analysis revealed that in the case of changes related to internal functioning, agencies normally have complete freedom to make such changes. Yet, in many cases, even when it is clear that certain changes are required to improve the processes, the former cannot be implemented because agencies lack authority to do so. This is usually the case when processes are imposed by legislation or by government authorities.

In the working group sessions held during the seminar, this gave rise to the question whether it is worth gathering information on matters the agencies know well beforehand they cannot be changed. However, the fact that no direct change can be made does not mean that proposals should not be put forward. The competent authorities should be made aware of the opportunities for improving the processes. The agencies, in most cases, have the information on hand to make an informed judgement on whether processes and criteria need to be amended with a view to improving them.

Subsequent to the analysis carried out, one of the challenges found by the working group to face all agencies was the lack of communication with regard to the outcomes to emerge both about the actual processes as well as the satisfaction amongst stakeholders on the agency's work. Society needs to be informed of the outcomes, and how this can be achieved is one of the challenges agencies must deal with. Certain agencies such as ACSUCYL do publish the outcomes obtained although there is no subsequent feedback in relation thereto. With this goal in mind, AEQES is organising discussion groups.

## **RESULTS**

As a result of this exercise, the new ideas that emerged related to two areas:

1. All agencies face similar challenges with regard to publicising outcomes, namely:
  - How to address society at large
  - How to determine who to talk to
  - Transparency
2. Hearings and discussions with stakeholders about the outcomes of the surveys need to be held. As pointed out previously, it is interesting to obtain subsequent feedback on the outcomes. Some agencies like VLIR and AEQES have already started to do this through debriefing sessions. In order to lend greater weight to this issue, agencies should also include this question in their communication plan.



## **CONCLUSION**

Gathering information from all stakeholders concerning the activities agencies are involved in is something we all need to consider. Doing this correctly, with a clear focus on specific objectives, which should concur with those of the agency itself, using the appropriate methods and conducting proper follow-up of the emerging outcomes will no doubt have a beneficial effect and improve the activities we engage in.

We should not overlook the problems agencies are facing when undertaking a project of this nature, such as deciding which stakeholders to consult, or how to obtain reliable information or higher response rates.

Furthermore, even when agencies do obtain useful and reliable information which enables them to suggest changes aimed at improving the processes, they lack the independence required to undertake such changes.

This should not, however, prevent agencies from continuing to work towards gathering information to improve, become more efficient and enhance the quality of their services as well as contributing towards the ongoing improvement of higher education.

## CHAPTER 3:

# THE BENCHMARK OF STAFF DEVELOPMENT; A VALUABLE FIRST STEP

*Douglas Blackstock, Quality Assurance Agency for Higher Education (QAA)*

*Marion Moser, Accreditation, Certification and Quality Assurance Institute (ACQUIN)*

*Henri Ponds, Accreditation Organisation of the Netherlands and Flanders (NVAO)*

## INTRODUCTION

The central theme of the 2011 seminar was benchmarking. Current practices and expertise in the agencies were compared and discussed related to three themes: Follow up on feedback, Performance indicators and Staff development. This contribution will discuss the benchmark on Staff development.

Five agencies participated in the benchmark on staff development: QAA from the United Kingdom, EVA from Denmark, ANECA from Spain, ACQUIN from Germany and NVAO from the Netherlands and Flanders. These agencies cooperated in advance of the seminar and presented a common result during the seminar. Hereafter the process and the main results of this benchmark on staff development are presented.

## PROCESS

The preparation of the seminar and the benchmark activity was coordinated by the SG, which formulated five basic questions to be considered for all three, mentioned benchmark themes. The five questions, applied to staff development, are:

- What core competences do you wish staff to achieve through *staff development* in your organisation?
- What sort of *staff development* activities do you have and how are they organised?
- What and with what methods do you collect information on *Staff development*? How do you report and act on this information?
- What are the strengths and weaknesses of your current practice?
- How are you thinking of developing your practice?

First of all, the five agencies involved in the staff development benchmark exercise were asked to answer these questions in a written contribution. Due to costs and the distance between the five agencies a practical way of deliberation was chosen. Two agencies, EVA and NVAO, were prepared to take care of progress and to involve the other three agencies in conducting the activity. Communication took place by e-mail and telephone.

The separate contributions were analysed by EVA and NVAO and, as a result, 10 concrete benchmark topics were indicated and proposed to the other three agencies. These benchmark topics guided the comparison that was carried out afterwards.

The five agencies agreed on the following 10 topics:

- Required competencies for staff;
- Current competencies of staff;
- Assessment of current staff;
- Selection and guidance of new staff;

- Training and development on the long run;
- Training and coaching on the job;
- Rewards/incentives;
- Human Resources Budget;
- Internal Quality Assurance (monitoring);
- Strengths/weaknesses.

Thereafter, the five contributions were screened on the current and planned practice in an agency related to the ten benchmark topics. What is the agency actually doing at this time and what are their plans for the coming period? The results were presented in an overview and sent to the five agencies with a request for comments. After processing their response the overview was completed. Ideally the next step would have been to discuss the results in a meeting of the five agencies more thoroughly. But, as mentioned earlier, this was not feasible. However, the meeting during the seminar, where the preliminary results were presented, was considered to be an acceptable and pragmatic alternative. Fruitful discussions about staff development were held and brought this case further.

The results of the comparison from the five agencies to the 10 benchmark points are presented here.

A short characteristic of the activities of the group of five agencies is useful. All agencies are involved in evaluation and/or accreditation. Three agencies have programme assessment or accreditation as main activity (ACQUIN, ANECA and EVA), and two agencies apply institutional audits (QAA and NVAO). One agency is in the position to combine institutional audit and programme assessment (NVAO).

Furthermore, two agencies are involved in specific assessment activities as evaluations of teaching and learning and evaluation of staff (ACQUIN and ANECA). To get an impression of the size of the agencies, the number of staff gives a rough indication. QAA and EVA are big agencies with more than 100 employed staff. EVA is not only involved in higher education; its higher education department is therefore smaller (32 staff members). ANECA counts 86 staff members. NVAO is quite big as well (about 50 staff members). Finally, ACQUIN is smaller with 22 staff members.

These similarities and differences make a benchmark on Staff development not always easy, but the five agencies are comparable enough to learn from each other on specific aspects of staff development.

## **REQUIRED AND CURRENT COMPETENCES OF STAFF**

In this benchmark activity, we focused on the professional staff of agencies; that means staff acting on policy level in the agency and (mostly) not part of the evaluation committee or an evaluation panel. Professional roles of these staff members are often policy advisor, process or project coordinator and/or sometimes secretary of the committee or evaluator of panel or committee reports. Staff members can be auditors as well. It turned out that, to be successful in these roles, at least a degree on Bachelor level, but mostly on Master level, is required in the agencies. Most staff in our five agencies hold a Master's level degree. (Nearly) all agencies have employees with a doctorate degree on the level of professional staff, but PhD employees are a minority. Work experience in the higher education sector is mostly required, but this differs between agencies. The discussion during the seminar showed that there is a need for staff with mixed backgrounds. It is important to have senior staff with experience from the institutions. But there is also need for less experienced staff at an earlier stage of their

career. Staff having a background solely from private consulting companies/industry might lack the necessary understanding of the political context.

The needs for improvement of staff skills differ between the agencies and vary from improving skills on leadership and management to increasing efficiency in performance and improving languages, communication and teamwork skills. The importance of sharing experiences and cases is mentioned nearly by all. We might call it the need for inter-vision or learning from colleagues. In any case, the need for improvement is determined on an individual basis in all agencies during the annual performance interviews.

## **STAFF ASSESSMENT**

Staff Assessment is nearly always done on an annual basis in all agencies. The individual performance of staff is assessed and targets for personal development are indicated. An interim update after six months occurs in QAA and EVA. A personal development plan is applied in only one agency; another agency (NVAO) has planned it for the near future. In two agencies (EVA and QAA) the results of the performance interviews give input to the training and development strategy of the agency. A preliminary conclusion could be that staff assessment is in place, but the relation between the results of individual performance, a personal development plan and the development strategy of the organisation can be strengthened in most agencies. The bigger agencies seem to have an advantage here because of their size and structure (e.g. with a separate Human Resource Department or Manager).

## **STAFF DEVELOPMENT**

Staff development activities in the five agencies show a wide variety. In bigger agencies, the approach is rather structured in a training (or career) and development plan. Existing examples in the five agencies are:

- information talks (e.g. inviting guest speakers from outside or inside);
- advanced user scheme (colleagues support for new or inexperienced colleagues);
- a leadership programme when it fits the needs of the agency;
- courses in evaluation theory and methodology;
- courses in quality assurance;
- a programme in project management;
- courses in communication and languages;
- courses in report writing and participating in (inter)national conferences are usual in all agencies.

Sometimes internships and secondments are used (e.g. a temporary place in the higher education sector). Inter-vision (learning from cases and practice) is explicitly applied in two agencies. In all agencies, staff development activities are always based on individual needs.

In conclusion, a variety of activities exist that fit to the direct needs in the organisation. In some agencies, staff gets facilities to study for a higher degree (e.g. a doctorate degree) which means an investment for the long run.

## **SELECTION AND GUIDANCE OF NEW STAFF AND TRAINING ON THE JOB**

New staff is mostly guided by a senior staff member (a mentor) during the first six months. An introduction programme in place is usual in all agencies. Training on the job

is practiced by participating in existing activities. Exchange of knowledge and experience between staff is a current practice in the five agencies, e.g. through inter-vision meetings, cross-reading reports (four eyes principle), to assure true outcomes and results of assessments and accreditation. Internal job rotation is often mentioned to train on the job; however, job rotation with external partners seldom occurs.

## **REWARDS/INCENTIVES AND HUMAN RESOURCES BUDGET**

Agencies rarely give additional financial rewards. The reward is most of the time education and training oriented or related to other development opportunities. The key figures gathered to the human resources budget are not easy to compare as the agencies use different ways to present them. It seems that between 350 and 600 euro is spent per employee every year in agencies of a substantial size. This could relate to about 3 to 4 percent of the total annual budget of the agency.

## **INTERNAL QUALITY ASSURANCE / MONITORING STAFF DEVELOPMENT**

The monitoring of staff development also differs between agencies. Some agencies have systems where systematic evaluation of their work results in systematic evaluation of staff performance as well. Some agencies (QAA, ACQUIN) use key performance indicators, for instance quarterly (QAA). Other agencies use also feedback from staff satisfaction surveys (NVAO and EVA). Staff development can follow a more qualitative approach as well. For example, EVA monitors staff development through appraisal interviews twice a year with a systematic follow up without using key performance indicators.

## **STRENGTHS/WEAKNESSES**

When it comes to strengths and areas to improve, all agencies have different priorities. For instance, QAA is strong in 'in house' expertise in training and development and has advanced systems, but these activities can still be further developed. EVA is strong in qualitative processes, but has to cover many different types of evaluations besides quality assurance work, which gives staff variation of tasks. In this situation, it is challenging to manage staff competences and development. ACQUIN, as a smaller organisation, focuses on a need for more systematic staff development but is strong in its ability to make room for individual needs. ANECA offers good job conditions and has already well defined procedures regarding professional development with training and self improvement and training based on individual needs as languages and ICT skills. Still, ANECA wishes to develop more certain areas. And finally, NVAO intends to focus more on the use of personal development plans and the assessment of competences of current staff.

## **CONCLUSION**

The benchmark on staff development can be assessed as a valuable first step. The exercise carried out for the IQA seminar was a good exercise from which the five agencies have already learned a lot. At the same time, they all agree that 'the job is not completed yet', but has just started. A good comparison as an essential part of a good benchmark requires that all parties involved are well prepared and meet face-to-face. These conditions are needed to make further progress. Face-to-face meetings will be difficult to organise, but it is important to look for more support and facilities. The development of web conferencing or 'webinars' could assist in crossing boundaries.

Nevertheless, this first benchmark activity demonstrates that staff development is a significant issue into which agencies put substantial effort. As professional staff is the 'core capital' of a quality assurance agency, this might be self evident. Benchmarking on staff development is an opportunity to gather new ideas and inspiration.

## CHAPTER 4:

# BENCHMARKING OF PERFORMANCE INDICATORS

*Matti Kajaste, Finnish Higher Education Evaluation Council (FINHEEC)*

*Luis Carlos Velón Sixto, Agency for Quality Assurance in the Galician University System (ACSUG)*

*Harald Scheuthle, Stiftung Evaluationsagentur Baden-Wuerttemberg (evalag)*

*Núria Comet, Catalan University Quality Assurance Agency (AQU Catalunya)*

*Sérgio Machado dos Santos, Agency for Evaluation and Accreditation of Higher Education (A3ES)*

## INTRODUCTION

The annual seminar of the ENQA Internal Quality Assurance Group (IQA), held in June 2011, concentrated in the use of benchmarking as a tool for learning and developing the quality assurance agencies' respective internal QA systems. The IQA Steering Group set up three different topics for benchmarking. The topic of performance indicators turned out to be so popular that two different subgroups, each composed of three agencies, were formed.

## SUBGROUP ONE

The first subgroup consisted in ACSUG (Spain), evalag (Germany) and FINHEEC (Finland). The three agencies had a meeting in Mannheim, hosted by evalag on 26th April 2011. The partners first prepared short presentations on their activities, internal quality assurance systems and the ways in which performance indicators are used.

## Different approaches

### ACSUG

The Agency for Quality Assurance in the Galician University System was founded in 2001 as a joint project of the Galician Government and the three Galician universities. The key mission of the ACSUG is to contribute towards the improvement of the Galician University System by issuing reports, conducting assessments, providing certification and accreditation for Galician University activities, particularly those related to teaching, research, the transfer of knowledge, and management. The ACSUG also acts as an instrument for the permanent collection and channeling of information between the Galician universities, other institutions and stakeholders, enabling the Galician University System to remain up to date and in touch with changing social demands.

ACSUG, as a quality assurance agency, is also subject to quality criteria and has established, and externally certified, a Quality Management and Environment System, according to the ISO 9001:2008 and ISO 14001:2004 regulations and the EMAS Regulation. This system is based on continuous improvement to obtain efficient and effective performance of its activities. ACSUG has identified, into its management system, the different procedures needed for the good functioning of the agency and it has established different indicators to measure the quality of its activities.

evalag

evalag was founded in 2001 by the state of Baden-Württemberg as a Foundation under public law. Since 2009, evalag is recognised as an accreditation agency in Germany. Its main objective is to support higher education institutions in developing their internal quality. Therefore, evalag offers a broad range of services and external quality assurance procedures such as consulting services, evaluations, quality audits and accreditations. In supporting higher education institutions, evalag follows an enhancement-led approach that focuses on developing the internal quality management processes in institutions.

In its own internal quality assurance, evalag strongly relies on qualitative methods, which are supplemented by quantitative indicators. The main improvement tool is the internal reflection of the quality assurance procedures carried out by evalag. On a regular basis (once or twice a year) all employees meet to discuss along nine pre-set topics the procedures and experience gained, with a view to enhancement. Additionally, evalag gathers online feedback questionnaires from experts and higher education institutions after each procedure. The feedback received is used for the internal reflection as well.

FINHEEC

The Finnish Higher Education Evaluation Council was founded in 1996. It currently conducts three different types of evaluations: institutional audits of quality assurance systems of mainly Finnish higher education institutions, thematic evaluations on different topics related to higher education and evaluations of centres of excellence in both university and university of applied sciences sectors. FINHEEC is an independent expert body assisting universities, universities of applied sciences and the Ministry of Education and Culture in matters related to evaluation, thus contributing to the improvement of higher education. FINHEEC adopts a profoundly enhancement-led approach with a strong emphasis on supporting the higher education institutions to improve the quality of provision. FINHEEC is exclusively funded by the government.

FINHEEC gathers feedback systematically after all evaluations, both from institutions and review panels. The feedback is used in the annual development seminars of the FINHEEC Secretariat and Evaluation Council. The changes made to operations and processes are then communicated to the feedback providers. From the feedback a number of indicators are drawn. These relate to the quality of the output, normally an evaluation report, of the evaluation process and of the evaluation team selected. In addition, FINHEEC utilises other indicators on the activities of the Secretariat (for example, lectures given, seminars held and participated in). The feedback is reported to the Evaluation Council annually.

### **Similarities**

The striking similarities between the three benchmarking partners made learning from each agency immediate. First of all, all three agencies conduct audits of higher education institutions, which means that they were all aware of the possibilities and limitations related to such evaluation methods. evalag's approach is perhaps even more enhancement-led than FINHEEC's since the former tailor-makes the evaluation method for each individual institution. FINHEEC, on the other hand, uses the quality audit model as the national quality assurance method and therefore all audits are uniform with the exactly same criteria.

Secondly, all three agencies utilise online questionnaires for gathering feedback and building 'customer satisfaction'-type surveys from which the most important



performance indicators are drawn. The web-based facilities make it more time efficient to gather, use and disseminate the feedback information and to calculate the indicators.

Thirdly, all benchmarking partners report the annual performance indicator readings to their respective councils annually. Together with the evaluation council's expertise and experience, more profound changes to operations and processes can be made.

Finally, the objectives which ACSUG, evalag and FINHEEC have set on their internal quality assurance are strikingly similar. The IQA work is mostly done to improve the internal operations of the agency and to assure the quality of evaluations. All agree on the most important issues that internal quality should focus on and these are also reflected by the chosen performance indicators.

## **Differences**

Most of the differences in the use of performance indicators arise from the differences in the evaluations themselves and the way they are organised. Due to the relative uniqueness of evalag's evaluations, its processes cannot be easily compared and therefore its working performance indicators are difficult to adopt by other agencies. Also, evalag has so far conducted only a fairly limited amount (two at the time of the benchmarking exercise) of institutional audits and repeatable patterns have yet to emerge. FINHEEC has more experience in conducting institutional audits and its evaluation processes are aimed at being fairly uniform. Therefore performance indicators are easier to apply. ACSUG, by comparison, uses an Internal Management System based on the standards ISO-9001 (quality), ISO 14001 and EMAS (environment) with a fairly robust set of indicators. ACSUG supports a much wider range of indicators than FINHEEC, both in terms of indicators monitoring the quality of the output and the quality of the evaluation process itself. ACSUG has also appointed a special technician for coordinating the internal quality work and performance indicators, while other agencies have dedicated fewer resources to these issues.

## **Observations**

The benchmarking partners prepared a presentation for the annual IQA seminar held in Helsinki, Finland in June 2011. The presentation highlighted a number of issues that the partners felt might be of benefit to the participants of the seminar.

Firstly, FINHEEC shared a problem common to many or most quality assurance agencies. Most of the feedback questionnaires and other forms of dialogue with higher education institutions actually reach only the very top leadership of the institution, which means that only the leadership voice is heard, at least directly, by the agency. This may become a dangerous illusion, as the leadership cannot entirely represent the opinion of the whole staff. The benchmarking partners suggested the possibility to conduct a number of feedback surveys, with separate questionnaires designed to collect information from non leadership staff members or students. evalag started sending feedback questionnaires to all site visit participants in order to gather a broader feedback on its procedure and on the reception of the recommendations in the institution.

Secondly, ACSUG shared an indicator that could be useful to other agencies as well. ACSUG follows the involvement of staff – in internal quality assurance – who are in charge of collecting data for either individual indicators or ownership of processes. This was seen by the benchmarking partners as a useful way to spread responsibility and strengthen the commitment of the whole organisation on internal quality assurance.

Thirdly, ACSUG also follows, as a part of its wide range of indicators, the percentage of planned trainings in which staff members have actually participated. In addition, ACSUG

gathers feedback from staff on the usefulness and quality of the trainings to improve them.

### **Final thoughts**

The three agencies found the benchmarking exercise extremely useful. The partners learned about very different ways to build an internal quality assurance system and different approaches to performance indicators. A number of tacit-knowledge pieces of information were also shared on building and running performance indicator schemes. This method of fairly personal benchmarking provided the parties with an opportunity to freely discuss the possibilities, ideas and concerns related to indicators and IQA systems. Also, the partners strongly felt that the face-to-face meeting greatly facilitated the free exchange of ideas and experiences. The official, printed information is fairly easy to share by just sending out documents, but an important role in running an internal quality assurance system is played by tacit knowledge, which cannot be baked into a pdf.

### **SUBGROUP TWO**

In subgroup two, the partners were AQU Catalunya (Spain) and A3ES (Portugal).

First of all, the two partners compared their agency and the way their internal quality system is managed. They prepared a short presentation on their activities, internal quality assurance systems and the way performance indicators are used.

### **AQU Catalunya**

AQU Catalunya is the primary body responsible for quality promotion and assurance in the Catalan higher education system. It is a public agency subject to private law, operating under the authority of the government department which has jurisdiction over universities. It is a separate legal entity with full legal capacity to act and has its own privileges and liabilities.

Set up as a consortium between the Catalan Government (Generalitat de Catalunya) and the universities in 1996, the Agency was the first quality assurance agency established in Spain. With the passing of the Catalan Universities Act (2003), the Agency was renamed (Agència per a la Qualitat del Sistema Universitari de Catalunya). The purpose of AQU Catalunya is to carry out the evaluation, accreditation and certification of quality in the universities and higher education institutions in Catalonia.

Since 1996 the implementation of the quality management system at AQU Catalunya reflects the willingness to implement a mechanism that allows the organisation to be managed in a systematic and visible way both for the management team and for all staff. The system gathers the results of all processes thorough quantitative and qualitative indicators, as well as the feedback from all the stakeholders involved in the process (experts, institutions, AQU staff). At the end of each project, AQU compiles a final document including the feedback, self-evaluation and indicators. Every year, AQU conducts the annual review of the internal quality system, resulting in a report. AQU is ISO 9001 certified, which implies two annual mandatory reviews (internal and external) of the internal quality system.

### **A3ES**

A3ES is a private law foundation created by the State, independent in its decisions, with responsibility for the assessment and accreditation of Portuguese higher education institutions and their study programmes, and the promotion of the integration of Portugal in the European system of quality assurance in higher education. Currently, the agency

is concentrating its work on compulsory ex-ante and ex-post accreditation of degree programmes and is launching a voluntary process of institutional audit.

Internal quality assurance of A3ES relies both on formal and informal mechanisms. Formal mechanisms include feedback questionnaires from institutions, experts and process managers, as well as an annual visit and review by a fully international Scientific Committee of well recognised experts. Informal mechanisms, more adaptable to the small size of the agency, consist of the frequent contacts of the Board members with all the collaborators and with the institutions. Research projects on quality assurance, carried out by the Development and Analysis Office, contribute to the agency's continuous enhancement.

## **Objective**

The objective of the group was to share information about indicators and assess if they were usable to compare the performance of the Agencies.

## **Development**

The actions taken were:

- 1st activity: define the classification of indicators
- 2nd activity: define characteristics of each indicator
- 3rd activity: agree which are the common indicators in each group
- 4th activity: take some conclusions.

As regards the classification of indicators, the group decided to make the classification according to the aspects to be measured:

- **Level of Activity:** quantitative measure of the different types of activities performed by the Agency concerning information, documentation and assessments;
- **Internal and external capacity building:** indicators on the qualification and training of internal staff and staff involved in QA activities within HEIs;
- **Impact:** quantitative measure of the effect of the Agency's activity on HEIs and society;
- **Resources:** indicators related to the Agency's financial and human resources;
- **Satisfaction:** qualitative indicators about satisfaction of Agency's internal and external activities.

The characteristics of each indicator were defined:

1. Name and description
2. Method to collect the information
  - Manual
  - Data Base / Electronic Platform
3. Periodicity
  - Annual
  - At any time
4. Categorisation
  - By Institution's typology (university, polytechnic, public, private, etc.)
  - By assessment
5. Public Information
  - Published on the web: public report
  - Internal report: agency report

Although only two Agencies took part in the exercise, some common indicators were nevertheless found, and are summarised in the following table:

<b>TYPE</b>	<b>INDICATOR</b>	<b>COMMENTS</b>
Level of activity	Nb. of institutional assessments	Audit assessments
	Nb. of programme assessments	Assessments (leading or not an accreditation decision)
	Nb. of international assessments	Assessments done in other countries.
	Nb. of HEIs involved	Nb. of HEIs that submitted programmes for accreditation each year
Results	Nb. of positive results	Nb. of proposals with a positive decision
	Nb. of negative results	Nb. of proposals with a negative accreditation decision
	Nb. of conditional decisions	Nb. of proposals with a conditional accreditation decision
Level Activity - Information	Nb. of reports	Nb. of reports from the review panels, concerning any activity
	Nb. of publications	Nb. of papers, reports, books published by the Agency (paper or digital versions)
	Nb. of news on the website	
Level Activity - Information	Nb. of studies	Nb. of thematic or cross-sector studies undertaken by the R&D Unit
Internal and external capacity building	Nb. of hours of training (for internal staff)	
	Nb. of training actions done for internal staff	
	Nb. of training actions done for staff of HEIs	
	Nb. of conferences or seminars (in HEIs or others) with participation of the Agency	
Resources	Total staff	
	Nb. of technical staff	
	Nb. of external experts participating in review panels (national / international)	
	Total budget	
	Annual costs with external experts (payment and logistic cost)	
	Annual costs with staff	
Impact	Nb. of visits to the website	
Satisfaction	Surveys	Qualitative indicators, not numerical. Difficult to compare
	Nb. of comments in each report	

## **CONCLUSIONS**

Following the comparison exercise of the two Agencies, these conclusions may be drawn:

Is it possible to compare Agencies?

- The agencies work in very different contexts, using different processes although some have comparable procedures;
- The indicators used for this benchmarking exercise may seem, at first sight, to be of little value and have little meaning if considered alone. They are context sensitive;
- More data from different agencies would be needed to choose the best and most representative indicators.

Could indicators be a tool to compare the performance of the agencies?

- It is difficult and lengthy to compare agencies with this type of indicators;
- They are a good internal tools to monitor and improve the effectiveness of the quality management system;
- It is useful to know which indicators other agencies use (qualitative comparison).

## **FINAL THOUGHTS**

Some areas to work on in the future were identified:

- The group considered that it could be more important to proceed with the exchange of practices on the use of different procedures;
- Nevertheless, when exchanging and comparing practices, agencies should also look at the way(s) in which they measure the impact of such practices (internal: resources; and external: results)
- It would be important to develop meaningful indicators to assess the impact of the agency's work on HEIs and on the HE system as a whole.

# CONCLUSIONS

The 2011 seminar “*Learning from each other – using benchmarking to develop IQA*” revealed the constant interest of benchmarking as a tool for quality improvement in quality assurance agencies.

The benchmarking exercise and the resulting articles of this report provided interesting reflections on the following focus areas:

## **FOLLOW-UP OF FEEDBACK**

This session underlined the importance of gathering correct information from stakeholders, not only using surveys but also through informal meetings or discussion groups. It pointed out also the difficulty of pinpointing the strategic “stakeholders” when gathering information and the problem of implementing improvements in the process when it is imposed by legislation or by government authorities.

## **STAFF COMPETENCE/DEVELOPMENT**

This session arrived to the major conclusion that staff assessment is considered as a tool to improve competences but needs to be further developed. A wide variety of activities for staff development exist within the agencies, ranging from a structured development plan to individual courses. Agencies rarely prefer using financial rewards and incentives but rather use alternative schemes such as education and training.

## **PERFORMANCE INDICATORS**

First of all, the use of performance indicators reported to the board/council of the agency helps to improve the operations and processes carried out in the agency. At the same time, the different use of performance indicators in each agency makes it difficult to compare agencies. It is however clear that, involving the staff in collecting data is a way to make the whole agency feel responsible for IQA: it is important to develop meaningful indicators to assess the impact of agency’s work.

All the groups felt that, although new technology helps to share information, face-to-face meetings were most adequate to freely exchange ideas and experiences and, consequently, obtain better benchmarking results. The seminar reached its objective, that is, to present findings of an effective benchmarking exercise between agencies having a similar profile and common interests.

# ANNEX

## **INTERNAL QUALITY ASSURANCE GROUP SEMINAR 16 AND 17 JUNE 2011 HELSINKI, FINLAND**

HOSTED BY FINNISH HIGHER EDUCATION EVALUATION COUNCIL (FINHEEC)

### **Venue**

Ministry of Education and Culture  
Auditorium Jukola  
Meritullinkatu 1  
Helsinki, Finland

### **PROGRAMME**

**DAY 1: 16 JUNE 2011**

***Chair: Matti Kajaste, FINHEEC***


- 11:30 Registration
- 12:00 Lunch at restaurant Sipuli, Kanavaranta 7
- 13:00 Opening session  
*Tine Holm, EVA, ENQA Board*  
*Marja-Liisa Saarilampi, FINHEEC*  
*Matti Kajaste, FINHEEC*
- 13:30 Keynote speech on the theme of Benchmarking  
*Nadine Burquel, Secretary-General of the European centre of Strategic Management of Universities (ESMU)*
- 15:00 Break
- 15:30 Presentation of the benchmark topic "Performance Indicators"  
*Matti Kajaste, FINHEEC and Nuria Comet Señal, AQU Catalunya*
- 16:00 Discussion in small groups about the experiences and results on this theme in all participating agencies
- 17:00 End of day one and introduction to the social programme  
*Matti Kajaste, FINHEEC*
- 19:30 M/S Panda embarks from Kauppatori harbour for a cruise in Helsinki archipelago
- 20:30 Dinner at Nyländska Jaktklubben

## DAY 2: 17 JUNE 2011

### **Chair: Matti Kajaste, FINHEEC**

- 8:30 Election of Steering group  
*Henri Ponds, NVAO*
- 9:00 Presentation of the benchmark topic "Staff development"  
*Henri Ponds, NVAO*
- 9:30 Discussion in small groups about the experiences and results on this theme  
in all participating agencies
- 10:30 Break
- 11:00 Presentation of the benchmark topic "Follow-up on feedback"  
*Sandra Marcos, ACSUCYL*
- 11:30 Discussion in small groups about the experiences and results on this theme  
in all participating agencies
- 12:30 Lunch at restaurant Sipuli, Kanavaranta 7
- 13:30 Plenary feedback of the three small table sessions on the three benchmark  
topics  
*Maiki Udam, EKKA and Douglas Blackstock, QAA*
- 14:30 Feedback session from the seminar and ideas for next year  
*Matti Kajaste, FINHEEC*
- 15:00 Conclusions  
*Matti Kajaste, FINHEEC*





**THIS REPORT** is based on the annual ENQA Internal Quality Assurance seminar on the theme of **Learning from each other – using benchmarking to develop IQA** that was held on 16-17 June 2011 in Helsinki, Finland.

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