

Licence to Kill

About accreditation issues and James Bond¹

By Ko Scheele²

Accreditation has become something of a hot topic in higher education in Europe. My former Senior Inspector, Frans Leeuw, once called accreditation a "Licence to Kill". The James Bond metaphor is particularly illustrative when reflecting on quality assurance challenges in higher education. If you look at publications on this subject in recent years, many issues associated with accreditation are explainable using titles of Bond films.

1. From Russia with Love: the origin of European accreditation

The Bologna Declaration was signed in 1999 by 29 European ministers of education. They declared their support for creating a European Higher Education Area by introducing a higher education model consisting of two cycles (Bachelor/Master structure) and by strengthening quality assurance in higher education. They expressed the firm wish to expand co-operation in the quality assurance field by such means as the European Network of Quality Agencies (ENQA) and the European University Association (EUA) and by framing new legislation.

Given the European desire for co-operation, it may seem logical to introduce a single quality assurance system, i.e. accreditation, yet it is not an obvious course of action. The Bologna Declaration purposely avoided using the word accreditation. The European ministers did not want to pin themselves down to a single system, and definitely not to one uniform quality system. They chose to stick firmly to the national competence for education policy and quality assurance. Nevertheless, some European countries are now in the process of introducing or preparing accreditation. They include Germany, Ireland, Italy, the Netherlands, Norway, Austria, Spain and Belgium (Flanders).

When referring to other accreditation systems, Ministers tend to refer to the United States, as the system there exists for several decades. Interestingly they do not refer to existing accreditation systems in Eastern Europe. Forms of accreditation have existed for many years in Russia, Hungary, Poland and other countries. The reason was the explosive growth of commercial institutions of higher education. These are not voluntary quality assurance systems set up by educational institutions, but the system laid down by the government with the aim of guaranteeing quality in higher education. Pivotal to the Eastern European approach is the achievement of the minimum quality standard.

As a result of the Bologna Declaration, a working group, headed by the CRE (now EUA) prepared a report on accreditation. The CRE group involved in the project started out with the following working definition: *"Accreditation is a formal, published statement regarding the quality of an institution or a programme, following a cyclical evaluation based on agreed standards"*. Having a closer look to the CRE-definition and a couple of new accreditation systems in Europe it seems that they opted for a statutory system with a public quality mark that shows that education satisfies the criteria of basic quality. Viewed in this light, these accreditation systems appears to be rooted more in the East than in the West. But just as in "From Russia with Love", things are not exactly as they seem. In the Eastern European system, the focus is so much on meeting the basic quality standards that improvements beyond this level receive less attention. It is therefore no coincidence that international experts recommend giving more attention to this matter.

¹ This is a minor adaptation of the Dutch article in the retirement bundle presented to former Chief Education Inspector, Frans Leeuw.

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2. The World is Not Enough: uniformity at INQAAHE and ENQA

The remarkable thing in Europe is that despite the reason given (in the Bologna Declaration) for greater harmonisation and synergy, we see countless national initiatives in which accreditation:

- is defined and perceived differently;
- is sometimes a complete system, and sometimes an addition to an existing evaluation system;
- embraces the entire higher education system in some cases, and in others only new courses;
- is sometimes built around the institution, and sometimes around the programme.

Establishing national systems of accreditation therefore soon tend to produce divergence, in conflict with the Bologna Declaration.

Yet despite the great differences in the structuring of quality assurance systems, there is nevertheless substantial convergence. Harvey has shown that, regardless of whether it concerns an institution or programme evaluation, assessment, audit or accreditation, there is always the same kind of approach. External evaluation always begins with self-evaluation, peer evaluation (evaluation by impartial experts, usually from the field of study concerned), use of standards, performance indicators and public reports. Despite the different national initiatives, there are certainly opportunities for the Higher Education Area envisaged in the Bologna Declaration.

Comparability of systems is a good measure of trust, the ideal basis for international mobility, and that is the priority of the European ministers. But there are also some potential disadvantages to this approach. Harvey mentions "dramaturgical compliance": quality assurance will become a fixed ritual, according to fixed procedures, with quality assurance appearing to become an end rather than a means. To ensure that sufficient mutual trust exists, initiatives have been launched for a World Quality Register. Leeuw rightly mentions that this leaves the established ritual intact: this world standard is not enough.

3. The Man With the Golden Gun: bespoke or "one size fits all"?

"One size fits all" sums up the existing quality system in Europe. Comparability is the prime consideration, with the aim of assessing similar courses or institutions in a single procedure using the same assessment framework. This same principle applies in the European accreditation system.

The question is whether this development in quality assurance is in line with developments in education. According to Leeuw, we see variety in numerous forms in higher education:

- types of education;
- administrative relationships between institutions of higher education and universities;
- size of institutions of higher education;
- the way education is being modernised, based on the Bachelor/Master structure;
- method of selection, such as the introduction of a binding study recommendation;
- dual programmes or other programmes;
- extensive or intensive education;
- electronic learning environments.

A conceivable scenario for higher education is atomisation and shopping, which will result in individualisation of learning processes and learning styles. In this scenario, the student's personalised demand for education is becoming increasingly important. Quality assurance is geared to the substance of learning, to the offerings available, and accreditation could upset the proper harmonisation of supply and demand.

The Higher Education and Training Awards Council (HETAC) in Ireland has opted for promoting variety, also among non-university education providers. A robust attempt has been made to

sustain and improve the vocational degree programme in analogy with the United Kingdom and Australia. With quality assurance as one of the key factors. The number one consideration is to assure quality in each discipline. This starts by ensuring variation of quality assurance in each discipline.

The proposed approach starts with graduation courses and continues to the Masters. This prompts the question of whether the Bachelors should move in the same direction in due course. In the proposed evaluation, the role of information is decisive. As mentioned earlier, the submitted and validated information must meet stringent requirements. The institutions in Ireland do not seem to have much difficulty in this respect, because internal quality assurance automatically generates this kind of information. Are these the first signs of a trend towards breaking away from "one size fits all"? Will off-the-peg quality assurance (Walther PPK) disappear to make way for the Golden Gun of the tailor-made alternative?

4. Dr No: peers or more

The prevailing quality assurance model includes a large role to the impartial experts, or peers. The model actually encounters very little resistance. Van Berkel, for example, is highly critical of the system of peer assessment, but not of the experts themselves: *"As long as the courses come through the peer assessments, they take the view that they are working in the right way. Courses are satisfied if they pass the peer assessments. They receive the quality mark from external experts (...) Panel evaluation relies heavily on the expertise of the members of the visiting committee (...). Just as now, the committees should consist of experts with broadly-based skills in the subject matter of the course and with educational competencies."* This is a surprising finding, given that he also states that the assessment system does not touch on the essence of education. Apparently, it is not due to Dr No – who is, after all, smart enough to deliver the quality required - but rather because of the working method.

5. Golden Eye: the carpenter's eye and other pointers for the working method

Van Berkel asserts that the peer assessment process is increasingly being orchestrated by both the courses and the external organising authorities. Checklists are a popular means to this end. But he observes that fundamental relationships between the elements within education are not being examined: *"Education is more than the sum of all kinds of quality aspects."* Van Berkel advocates a more holistic approach, with the expert occupying a more central position. And he is not alone in putting the application of established standards into perspective.

Lee Harvey makes mention of an orchestrated game: *"Typically, auditors 'hold court' in the University Senate Room and see a stream of visitors, usually in small groups. These groups are summoned early by the university senior managers, briefed before they go in to see the auditors and de-briefed when they come out. The auditors hear a story that reflects the formal organisational process. Formal structures, though, are significantly removed from the reality of the living and dynamic organisation that is the university"*.

Leeuw follows Harvey in stating that the fixed established standards and methods allows perversion in the quality assurance system: *"Evaluation performance can inhibit innovation and lead to tunnel vision and ossification: organisational paralysis brought about by the system of performance measurement (...). It is reasonable to assume that no matter how well-intended evaluation activities may be, they can and probably will have unintended and undesired side effects that jeopardise performance and /or quality improvement within the evaluated or audited bodies"*.

Leeuw offers the following solution: *"Experimental or quasi-experimental designs for evaluation are preferred over other designs, triangulated data are preferred over single method approaches and longitudinal studies are preferred over single shot studies. Triangulation includes the use of mystery guests and unobtrusive measures"*. In other words: variation and surprise.

6. A View to a Kill: the example of the trial accreditation

Even before the Minister published his "Mark of Quality" policy document suggesting proposed accreditation in the Netherlands, the idea was already under experimentation in higher education. In 2000, a trial with accreditation was carried out in courses for social work and services as well as business economics (the so-called 'trial accreditation'). The protocol stated that the most important difference compared with the prevailing system of peer assessment was the greater emphasis on the objectivity of quality checks and determination of the degree to which the quality of education satisfies the defined quality requirements. With this in mind, the protocol put forward standards that have been elaborated into 80 verification items. Guidelines were also laid down for the working method (self-evaluation reports, panels and reports).

CHEPS, which evaluated the trial, expressed criticism on this point in its evaluation report. The guidelines and standards led to a cumbersome process: the guidelines were far too much of a good thing; the costs outweighed the benefits. Viewed in this light, the CHEPS evaluation seems to be a "view to an overkill". But the evaluation is not entirely negative; there are certainly learning benefits, among other things because of the objectivity. The decisions, for example, were thoroughly motivated.

Similarly, the Inspectorate of Education in the Netherlands carefully worded its opinion in its meta evaluation of the trial accreditation. Among other things, it expressed appreciation for the vast majority of the performed analyses and clearly worded opinions. But the Inspectorate also observed that the protocol of the trial accreditation for higher vocational education did not prescribe a number of matters and that they were consequently missing from the reports. An example is the absence of the requirement that the assessment should take previous evaluations into account. As regards the set of tools used, the Inspectorate said: "*The Inspectorate does consider expansion of the set of tools to be necessary. Where a regulation is not possible or desirable, the Inspectorate recommends using the instrument of triangulation: expansion of the external material with a view to internal, inter-subjective weightings*". One conclusion in any event seems inescapable: the quest for the Holy Grail of optimum quality assurance is more about smart systems than about large ones.

7. Live and Let Die: the report

The proof of the pudding is in the eating. Even with a very high quality panel and a perfect working method, the entire exercise will be a failure if the evaluation is not reported properly. That is why in its meta evaluation the Inspectorate laid down stringent requirements for reporting. Not only must all quality aspects be covered, but the report must also be a complete array of information, analysis and judgement. We know from experience that information and judgement are usually set down properly. The analysis is the critical point.

The West-European accreditation laws appear to assume that accreditation can be introduced "on top of" peer assessment without this generating any side-effects. This creates limitations that can be all the more penetrating as far as accreditation is concerned because there is no improvement process (in terms of possibly remedying shortcomings) but merely a *yes/no* decision. There are two possible consequences of this situation: the legitimacy of the accreditation could be undermined, particularly if the accreditation agency confines itself purely to validation of the reports. The second potential effect is that peer assessment will be jeopardised, or its nature will change. Institutions co-operate substantially in peer assessment at the present time, among other things or perhaps primarily because of the existence of an obvious improvement mechanism. In the case of direct *yes/no* decisions, there will be mounting pressure on institutions to adopt a strategic stance. This will increase the risk of reports of declining quality. It goes without saying that institutions and possibly also the visiting committees will be tempted not to disclose information, especially certain parts of the analysis.

8. For Your Eyes Only: disclosure?

One of the trickiest dilemmas of higher education systems is the degree of openness and disclosure. Despite all beautifully worded pronouncements like the Bologna Declaration, the European higher education market is still far from transparent. The European Higher Education Area is central to the Bologna Declaration and requires facilitation of student mobility. Minister Hermans recognised this by deciding resolutely that the accreditation system had to yield information above basic quality level.

One of the objections of institutions to public reporting is its misuse for "ranking". It is an understandable objection. The quality of higher education consists of numerous aspects that cannot be covered in a template or routine classification. However, rankings will ultimately be made anyway, on account of the transparency and disclosure of all information. Rankings already take place. They are made by private publishers, not only in the United States but also in Europe. But the manner in which the analyses are edited means that they are not always consistent and that the rankings are in some cases even misleading.

The methodological problems have not led to the publications becoming unpopular, however, and the opposite is actually the case. Even more surprising is that the national agencies have not considered it necessary to issue their own accurate public information. Why is this? For whose eyes are they afraid?

9. Tomorrow Never Dies: about infinite improvement

Public reporting is one thing, but action in response to it is something completely different. The follow-up in higher education quality assurance occurs in several forms: evaluation of the process, monitoring of improvement plans, monitoring of improvement activities and, last but not least, monitoring of the effects of the improvement. So are sanctions taken?

The forms of follow-up action in Europe are scarce. That applies very notably to the imposition of sanctions. Quality assurance in Europe is apparently set in the framework of the possibility of improvement and further improvement. What about the Netherlands? Do we show the players a yellow or perhaps even a red card?

10. The Living Daylights or Die Another Day?

A warning is in the air! Until 2003 in the Netherlands proceedings exist to give study programmes an official warning. If the given conditions are not met in due time, the diploma will then no longer be an official higher education diploma and the course will no longer qualify for funding. Students following the course will no longer be eligible for study grants. This amounts to a severe sanction. The basis for taking such a sanction was a report about an observed lack of quality, submitted by the Inspectorate to the Minister. Conditions for the measure are that the education provided by a course must have been demonstrably ailing over a series of years and that, after hearing the institution and/or course, there is no confidence in the serious shortcomings being rectified or the root cause being eliminated within a reasonable period (one year).

In Bond terms, the Inspectorate report is intended "to scare the living daylights out of her". But does this result in red cards? Despite the embedded picture in the Netherlands and beyond, the final sanction of definitive termination of funding has not yet occurred in the Netherlands, although we have come very close on a few occasions. In a number of cases, the institutions drew their own conclusions and closed down the course; in other cases, they took firm action. This was further stimulated by the "impending warning". Unorthodox agreements are possible in the Netherlands between the Minister and an institution if "a warning is in the air". That will be the case if there is:

- a prolonged serious shortcoming;
- endorsement by the Institution of the Inspectorate's analysis;

- an intention to issue a formal warning (yellow card or worse);
- a substantial and demonstrable improvement by the Institution;
- an agreement that the Inspectorate will re-examine the course in the near future (for example, in six months' time).

Unless the situation improves substantially in the intervening period, the Minister will continue to issue an official warning, followed by the possible withdrawal of accreditation. This amounts to a "Die Another Day" scenario. In three instances it has produced very fast results. The institutions concerned immediately took drastic improvement measures. The result was ultimately positive. Accreditation as a *yes/no* decision renders scenarios like this impossible. But the pressure on the system to make it possible will increase in my opinion.

11. The Spy Who Loved Me: stimulatory supervisions

The introduction of accreditation will stimulate the debate: "Who will accredit the accreditors"? The supervision of accreditation embraces:

- supervision of the accreditation agency itself this consists of supervision in respect of such matters as the negligent performance of duties, the holding of outside positions, the overturning of decisions and supervision of the effectiveness of the agency;
- the degree to which accreditation contributes to achievement of the defined goals;
- the degree of effectiveness of the accreditation system.

In the Netherlands, the Inspectorate for Education has this supervisory task. A specific role for the Inspectorate lies in situations where a course is found not to meet the standards at the time of accreditation, but where the Minister decides under special circumstances that it is in the public interest for the course to continue to exist. In that case, supervision of the required improvements and similar matters is necessary.

Less prominent, but no less important, are the following tasks:

- judging the quality of education; this takes place at system level, with the exception of examination of observance of rules prescribed by law;
- promoting the quality of education; this, too, occurs at system level;
- reporting on the development of education.

It remains to be seen whether the picture of the "Spy Who loved Me" is an appropriate parallel. But it does appear that more is being done in the way of stimulatory supervision than used to be the case - through the promotion of quality. It is a challenging prospect for the Inspectorate, because promoting quality of education is the bottom line, what it is all about. Quality of the highest level as an objective: Diamonds are forever?

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