

Elements of a Culture of Quality in the Implementation of Quality Assurance Systems of Countries in the European Higher Education Area

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Abstract—The implementation of quality management systems in higher education in different countries is determined by national regulatory choices and supranational indications (such as the European Standard Guidelines for Quality Assurance). The effective functioning and transformative capacity of these quality management systems largely depend on the organizational context in which they are applied and, more specifically, on the culture of quality developed in single universities or in single countries. The University's concept of quality culture integrates the structural dimension of Quality Assurance (QA) (quality management manuals, process definitions, tools) with the value dimension of an organization (principles, skills, and attitudes). Within the EHEA (European Higher Education Area), countries such as Portugal, the Netherlands, the UK, and Norway demonstrate a greater integration of QA principles in the various organizational levels and areas of competence of university institutions or have greater experience in implementation or scientific and political debate on the matter. Therefore, the study, through an integrative literature review, of the quality management systems of these countries is aimed at determining a framework of the culture of quality, helpful in defining the elements which, both in structural-organizational terms and in terms of values and skills and attitudes, have proved to be factors of success in the effective implementation of quality assurance systems in universities and in the countries considered in the research. In order for a QA system to effectively aim for continuous improvement in a complex and dynamic context such as the university one, it must embrace a holistic vision of quality from an integrative perspective, focusing on the objective of transforming the reality being evaluated.

Keywords—Higher education, quality assurance, quality culture, Portugal, Norway, Netherlands, United Kingdom.

I. INTRODUCTION

THE reality of Higher Education (HE) has undergone considerable changes in the last 20 years, mainly due to the supranational comparability of education courses aimed at greater and free mobility of teachers and students; the social context of reference has also changed, shifting from an elitist university view to a massification in access to university courses. This has led to an increasing focus on issues related to the implementation of quality management systems, aimed at ensuring both comparability between universities in the quality of training and research offerings and an increasingly efficient and effective management of teaching services, in light of the ever-increasing demand for training and the tightness of available financial resources. Therefore, it can be said that QA

systems in HE have been the most important lever for the development of HE, especially, as far as Europe is concerned, from the Bologna process onwards.

The aim and objectives of the Bologna Process were, in fact, to establish the EHEA, promoting the European Higher Education System worldwide through the achievement of six objectives, among which was to ensure the quality of the degree system. As a result, each European country has initiated new or revised existing internal and external quality assurance processes and integrated them into an appropriate regulation, in application of the European Standards and Guidelines (ESG) for QA, defined by the European Association for Quality Assurance in Higher Education (ENQA) in collaboration with the European Students' Union (ESU), the European Association of Institutions in Higher Education (EURASHE) and the European University Association (EUA) and adopted by the Ministers of Higher Education of 45 countries in the first instance in 2005 (Bergen meeting) and revised in 2015 (Yerevan meeting).

On the one hand, supranational regulations and indications such as at the European level have been decisive in giving new impetus to the development of quality management systems, on the other hand, much is defined by the ability of the individual institution to take on board the principles of quality, permeating the organisational culture of the same.

The European University Association in 2009 introduced the topic of the university's 'quality culture'; as a concept that integrates the structural dimension of QA (quality management manuals, process definitions, tools, instruments) with the dimension of an organisation's values, related to the sphere of values, competences and attitudes [1]. It can also be seen from the same experience of different countries that the evolution of QA systems differs with respect to various contextual factors that change from country to country according to the maturity of the sector, the level of flexibility given by the regulatory reference framework [2] and the national cultural context [3]. For this reason, it has been ascertained that the phenomenon of isomorphism of QA systems, i.e. the tendency to take models that work in some countries and transport them to other countries, has not proved to be an effective choice, as the 'copying' has not adequately taken into account the contextual factors of the specific country.

Studying the different experiences of implementing QA

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systems in a sample of European countries is interesting in order to capture elements of quality culture that have been developed or are proving to be strategic for improving the effective implementation of a quality system.

The countries and universities that in a previous integrative review [4] emerged as particularly interesting in terms of the research already present on the subject of QA integration is Portugal, and in terms of the maturity of QA systems are the Netherlands and the United Kingdom, while in terms of the breadth of areas considered in the QA system is Norway.

A first objective of the collection and analysis will be to represent the QA system of the identified country/university using the framework of QA as configured by [5], aiming to represent this system by observing the following elements: i) the objective of QA; ii) the subjects carrying out the verification procedures; iii) the areas/environments considered; iv) the QA procedures; v) the use that is made of the QA outcomes.

Parallel to the analysis of QA systems, the aim is to capture elements of quality culture highlighted in the literature, as well as from direct experience, by investigating what strategies have been used to develop the organisational culture in terms of quality and raise faculty compliance.

The research will be carried out through a review of the existing literature on the implementation of QA systems in Portugal, the Netherlands, the UK and Norway; in particular, since the focus of the investigation will be the best practices present in the international university context, the integrative review approach will be used, which allows us to focus on a complex phenomenon, keeping an open eye on both the theoretical and empirical dimensions [6].

II. THE IMPLEMENTATION OF QA SYSTEMS FROM DIFFERENT EUROPEAN COUNTRIES

As already mentioned, the implementation of QA systems in different European countries sees its main development since the important turning point of the Bologna Process. Before then, only a few pilot experiences can be recorded in Europe; this is the case in countries such as France, the Netherlands and the United Kingdom, which had already independently developed experiences with external QA models.

Subsequently, there was a growing conviction throughout Europe of the need to set up quality management systems capable of competing internationally, but different models and approaches were used. In particular, in Western European countries, the trend was towards a self-regulatory approach, whereas in Central and Eastern Europe, the model developed was a more centralised and prescriptive one [7].

In any case, the Bologna Process, but even more so the implementation of the 2005 and 2015 ESG Guidelines, has brought about profound changes within individual countries and individual institutions, which have found themselves having to redefine their QA framework by moving, for example, from a system of accreditation of institutions to an audit system (as in the case of Portugal in 2017) or in the change of the object of accreditation, most of which initially concerned the individual course of study and now instead shifts to the institution as a whole (as in the case of Denmark in 2017).

The Netherlands, France and Great Britain were the first countries in Europe in which the contours of a new formal quality assessment system became visible in the mid-1980s [8], while other countries such as Norway and Portugal developed their QA systems at a later stage, starting mainly with the Bologna Process and the definition of the ESGs, which thus marked a groove between QA systems that started more "naturally" following voluntary characteristics and drives of national university systems and between QA systems that were born (or modified) in the light of the international drive for comparison and then developed by "homogenisation" of QA systems.

A. The Netherlands

The Netherlands under the authority of self-organised sector cooperation developed from the very beginning an approach based on self-evaluation followed by peer review through visiting committees, considering the individual course of study and not the institution as the unit of evaluation. No performance indicators were used in the first implementation of QA in the Netherlands, although they were strongly supported by the government from the beginning.

As many as three evaluation series (each cycle lasted six years) were carried out in the field of university teaching and two series in the field of professional education.

In practice, all curricula by discipline were visited simultaneously. There was a strong element of curriculum comparison, seeking to establish a *communis opinio* of the peer community on content and standards, albeit without rigid externally imposed requirements, curricula or standards. This approach was also intended to create space for quality improvement. Improvement, or rather the establishment of internal quality management, from programme to institutional level, was an official goal of the quality assurance system [9].

This system has contributed a great deal to the development of the HE sector and has substantially contributed to the development of its quality, as well as being highly acclaimed abroad and seen as best practice from which many have taken example. However, as part of the debate on the implementation of the Bologna Declaration, it was decided to add an independent feature to the visiting system in the form of accreditation [10]. The main argument, in the wake of Bologna, was that accreditation was necessary for the European and international recognition of Dutch diplomas.

The Danish government cooperated with the government of Flanders to establish a 'Joint Quality Initiative' as early as 2000, immediately after the start of the Bologna Process, which produced important results, the most important of which were the Dublin descriptors, i.e. the declaratory statement of knowledge, competences and skills in terms of the learning expected of students at the end of education at various levels. The cooperation also led to the creation of the Dutch-Flemish Accreditation Organisation (Nederlands-Vlaamse Accreditatie Organisatie, NVAO), which became operational in 2004 and started working on the accreditation system of institutions; in 2003, the Netherlands introduced programme accreditation [11].

In addition to the course accreditation system, institution audits, i.e. a periodic, external and independent evaluation of the internal QA system, were introduced in 2011. The change experienced by the Dutch QA system thus marked a new approach to the conception of quality, which thus became conformity to standards, or in [12] terms: 'perfection'. As a result, complaints quickly emerged about accreditation causing a high level of 'red tape'. In the period 2003-2010, however, the first cycle of programme accreditation was completed: all bachelor and master programmes had to undergo this process once.

B. United Kingdom

In the UK, assessing the quality of HE has been an important issue since the early 1990s, when the government decided that universities should be accountable for public spending, accountable to the government, but also to other stakeholders such as students, parents, industry, professions and the community as a whole.

Greatrix [13] notes that accountability has become an 'essential feature of contemporary democracy', as those responsible for spending in the public sector are held accountable for their actions.

Brown's definition of accountability [14] as 'rendering an account to third parties of what you do, why you do it and how you do it knows that it is effective', underlines the reasoning behind the introduction of quality assessment as one of the provisions of the Higher and Further Education Act of 1992.

In addition to introducing a system for assessing quality, the 1992 Education Act led to the implementation of significant changes. To reflect national diversity, four HE funding bodies were set up for England, Scotland, Wales and Northern Ireland, which initiated the process of evaluating the quality of education and also established the Higher Education Quality Council (HEQC). In 1996, a report of the 'Joint Planning Group', jointly sponsored by HEFCE and the Committee of Vice-Chancellors and Principals (CVCP) [15], recommended the establishment of a new body to carry out the evaluation functions of the funding councils and the HEQC. This led to the creation of the Quality Assurance Agency for Higher Education (QAA) in 1997.

Until the 1996/97 academic year, quality assessments were carried out directly by the university's funding councils. During this period, a methodology known as Teaching Quality Assessment (TQA) was adopted. Since 1997/98 evaluations have been carried out by the QAA on behalf of the funding councils using a methodology known as Object Review [16].

Now the main benchmark of QA in the UK is the Quality Code for Higher Education, which sets out the core principles for quality in HE across the UK. These include an emphasis on the role of institutions in ensuring the quality of the experience they offer students, supporting student engagement and ensuring that external stimuli are used to support the integrity of awards and the quality of provision.

C. Norway

Since the 2003-2004 academic year in Norway, educational

policy reform has been widely introduced to meet quality requirements in HE. In Norway, many of these goals were achieved with the Quality Reform in 2003 by changing the assessment system, changing the credit system as well as the introduction of the three-cycle system (bachelor/master/doctorate) [17]. As its name indicates, the Quality Reform aims to increase the quality of HE in Norway. Students are to get more feedback during their courses, there are more homework obligations, and most education takes place in smaller groups.

The quality control of educational programmes and institutions is carried out through the independent government body "Norwegian Agency for Quality Assurance in Education" (NOKUT), which, through the assessment of the fulfilment of a certain set of standards of quality assurance systems for universities and colleges and the accreditation of disciplinary assessment, has the right to determine whether an institution should be classified as an accredited college, specialised college or university - or whether it should suspend or cease its activities.

Quality assurance in Norwegian HE is a dual responsibility. All HE institutions are responsible for the quality of their educational offerings and it is NOKUT's responsibility to ensure that all institutions comply with legal requirements and provide high-quality education.

There are two main entrances to quality assurance in Norwegian HE. The first relates to the accreditation of educational offers and the other to audits, supervision and review of accreditation.

Accreditation (institutional and programme) is compulsory and universal for all formally recognised HE in Norway. Accreditation is not limited to a specific period but is deemed valid until expressly revoked following a review.

Institutional quality assurance audits are the systematic and comprehensive mechanism for the external quality control of HE. Each institution must undergo an audit of its internal quality assurance system and of the institution's systematic quality work. An institution with self-accreditation rights that fails to conduct internal quality assurance in accordance with the criteria loses the right to self-accredit new educational offerings until the institution passes another audit. Maintaining the right balance between trust and verification is a fundamental concern in the Norwegian model and all NOKUT operations are designed with this balance in mind.

In 2017, the rules on academic supervision were revised to set requirements for systematic quality assurance practices of institutions. Previously based on in-depth assessments, audits are now based on legal requirements. To pass, institutions must fulfil each requirement. NOKUT and external experts also advise institutions on how to further develop their quality assurance practices. It is NOKUT's intention that supervision activities inspire institutions to rethink existing practices and try out new ideas, so that quality assurance activities can stimulate quality improvement.

D. Portugal

The Portuguese Agency for Evaluation and Accreditation of Higher Education, legally established in 2007 Currently (2015)

the first round of programme accreditation is underway, but at the same time the agency has started the certification of internal institutional quality assurance systems [18].

The evolution of quality assurance systems can be considered in stages, the first of which was accreditation where the priority was the elimination of substandard educational programmes [19].

The current problems faced by the Portuguese HE system belong to a different phase related to doubts about the innovative or quality assurance capacity of institutions, which explain the recently introduced internal quality assurance certifications. Certifications, therefore, would represent a guarantee of the institutions' quality assurance capacity and, consequently, are intended to trigger more streamlined accreditation procedures. This development could be interpreted as an attempt to restore trust in universities, to reaffirm quality as their responsibility and to give ownership of quality to their constituent bodies, according to a quality improvement approach [20].

Portugal's QA system consists of the evaluation and accreditation of HE institutions and their study programmes and aims to include Portugal in the European HE quality assurance system. The main purpose of A3ES is to ensure better performance of HE institutions and their study programmes and to guarantee compliance with the basic requirements for their official recognition.

III. THE OBJECTIVES OF QA

The first characteristic that distinguishes one QA system from another is the motivation, the aim, the objective underlying the system itself. The ability to pursue quality in an activity is intrinsically linked to the concept of 'quality' aimed at, a concept that does not find the same connotation among different QA systems [21], thus significantly affecting the purpose, the setting and the actors involved. Harvey and Green [12] identified several concepts of 'quality' applicable in the context of HE: i) Quality is something special or excellent; ii) Quality is something (a goal) that is perfect or consistent; iii) Quality is the ability to achieve a specific goal (fitness for purpose); iv) Quality is a process of transformation; to these concepts a further definition was added [22], bringing it closer to the stakeholder perspective, i.e. the degree of compliance with the quality criteria expected by the stakeholders.

From the experience of the QA systems analysed, the following main strands of objectives can be identified that the government and internal QA agencies set themselves when defining the country's QA system:

- contributing to the improvement of the quality of universities (improvement, development)
- ensuring the fulfilment of the expectations of the two main stakeholders: government and students (accountability)
- being accountable to society for the results achieved
- achieving transparency and comparability of study courses for better positioning in the international context (comparability)

In the Portuguese system, all elements can be found in the definition of the internal QA system, which aims to contribute

to the improvement of the quality of the institutions, while ensuring responsibility and accountability towards society. Moreover, specifically the accreditation system is aimed at ensuring that "quality at HE institutions meets the requirement of the government and stakeholders, and provides institutions with benchmarks on which to base their further development. But accreditation must also make the quality of Portuguese higher education programmes transparent and comparable in an international context" [23].

In the Norwegian QA system, the purpose entrusted to the QA agency in education is to supervise (control) and develop quality in HE. In turn, this agency is responsible for ensuring that the requirements of laws and regulations are met in the institutions' QA systems. It can thus be seen that alongside the aim of quality development in HE is the responsibility in terms of meeting the expectations and standards set by the government and translated into laws and regulations.

This duality is also found in the context of the Netherlands, where, however, the history of the development of the QA system has led to a more pronounced focus on the development and continuous improvement of the quality of institutions. With the introduction of the accreditation system - which is also binding for the purpose of student funding for students and for the funding of institutions - the concept of accountability towards students, employers and other social actors was introduced.

It is interesting to see how it takes on a different meaning to quality assessment in the field of teaching, that of research. In the Netherlands, the research evaluation exercise is aimed at revealing and confirming the quality and relevance of research to society and improving it where necessary, thus having different objectives, such as recognising the relevance of research, thus enhancing this dimension especially in relation to external society.

In the UK, the key factor for accreditation is to embed a culture of continuous improvement in institutions; it is part of the philosophy in UK universities to continually improve and enhance the quality of the offer provided to students.

In the first TQA (Teaching Quality Assurance) exercise, the government defined the following objectives:

- (a) ensure that all education for which it provides funding is of satisfactory quality or better, and ensure prompt rectification of unsatisfactory quality;
- (b) encourage improvements in the quality of education through the publication of evaluation reports and an annual report, and
- (c) inform funding and reward excellence.

A fundamental principle of the evaluation process was quality as understood by the stakeholders, described by Drennan [24] as a 'fitness for purpose' approach. Accreditation thus offers the representative bodies of the world of work the opportunity to reflect on the special needs and expectations regarding the knowledge and competences of new graduates. It is clear, therefore, that a key element of QA's role in the UK is to review and report (accountability) on how HE institutions maintain academic standards and quality. To achieve this goal, an important step in the QA process is for universities to

provide substantial information and included data [25].

A. Internal Evaluation Agencies

Each country, in accordance with the European Standards and Guidelines in terms of QA, has an internal agency, legitimised by the government, which operates to manage national accreditation, while ensuring that each institution works to guarantee the quality of its work.

In Portugal, the State established the Agency for the Evaluation and Accreditation of Higher Education (A3ES) in 2007 as a foundation under private law, endowed with legal personality and of public utility. It performs its functions independently of the State, but following its guiding principles defined by law. However, the external evaluation is based on the work of external evaluation commissions (EWCs), consisting of between three and five independent experts (including students) who carry out the evaluation of the institutions and draw up the final report. The commission is accompanied by a procedure manager from the National Agency A3ES, a professional in evaluation methodologies. However, the work of the commission is ultimately validated by the A3ES, which has the final say on accreditation as it is responsible for ensuring fairness and balance in the final decisions.

NVAO, in Netherlands, is the national external QA agency operating since 2004, initially operationally independent, but after the revision of the Higher Education Act it became largely government-funded (the rest of its revenue came from accreditation fees). The Dutch legislature decided in favour of a market for quality assessment agencies. For degree evaluation the NVAO must publish an annual list of quality evaluation agencies that meet the protocol for this in the Netherlands, the course directors of each individual course select a quality evaluation agency and the decision on when to apply for accreditation is made independently [16].

These agencies (such as QANU and NQA) are responsible for the actual organisation of the external evaluation teams, but the NVAO is responsible for the final evaluation reports.

In Norway, NOKUT is an independent governmental body with competencies in Norwegian and foreign HE and vocational education, operating since 2003. It not only supervises the quality assurance practices of institutions but also advises institutions on how to further develop their quality assurance practices. Its functions also include:

- Carrying out evaluations with the overall aim of investigating, assessing and developing the quality of HE in Norway.
- Developing and systematising knowledge on the quality of education through thematic surveys, studies and analyses, including conducting two large-scale surveys on students' and academics' perceptions of the quality of education.

NOKUT is also responsible for accrediting all programmes that institutions cannot accredit themselves.

In the UK, the QAA was established in 1997 as the single quality assurance service for HE providers in the UK. It is a government-independent body, a registered charity and a limited company. QAA is jointly financed by the institutions,

through an annual subscription, and the funding councils that contract with QAA to provide evidence to enable them to fulfil their statutory obligations. Consequently, it is accountable both to the HE sector and, indirectly, to the government sector, but above all, it is not beholden to either. It represents the interests of the government to the institutions and the views of the institutions to the government.

On some occasions, stakeholder interests have had a profound impact on the way QAA conducts its business, such as the lobbying of the Secretary of State for Education who in 2001 instructed QAA to discontinue subject review in England and to adopt a lighter approach to quality assurance based on institutional self-regulation [26]. By law, funding bodies in the UK have a duty to provide quality assessment of the provision they are funding. Each of the funding bodies enters into a contract with the QAA for quality assurance services. They each receive a copy of the full QAA report for each university in their jurisdiction

In addition to the national agency that deals with external QA, a key piece of a country's QA system is the individual institutions that are obliged, again under regulatory requirements, to establish an internal quality assurance policy for their courses of study, developing strategies, policies and procedures for continuous quality improvement. The conclusion is that internal quality assurance should be undertaken by HE institutions as part of their autonomy and in accordance with their own regulations.

B. The Areas Considered

Considering the objects of evaluation, within the framework of the quality systems of the different countries, common themes can certainly be identified among the various realities investigated:

- the teaching qualification: understood as "scientific level of teaching" and "teaching staff qualification and appropriateness to study cycles analysed" in the Portuguese model (according to the legislation (Law No 79/2019, 4 September), "teacher quality" in the Netherlands, "the research qualifications and research profile of the staff" in Norway or, generically, the concept of staff resources and respective professional development, also found in the UK model;
- teaching-learning environment, as defined in the Dutch model: in terms of both design and thus appropriateness of training objectives and programme definition, and delivery and thus in terms of teaching and learning methodologies, all aspects also present in the Portuguese, Norwegian and English models;
- student evaluation processes, i.e. student evaluation and examination processes are an important object of quality assurance (Netherlands, Portugal, UK);
- facilities and equipment for teaching, first and foremost, but also for research (this is the case in Portugal);
- the development of an effective internal QA system

These areas are found in all the systems where the agency directly accredits CSOs (Portugal, the Netherlands and the UK). Further specific topics are:

- the efficiency of the internal quality assurance system (Portugal)
- social support mechanisms (Portugal)
- degree course results (Netherlands)
- institutional policy (UK)
- quality of student admission (UK)
- student support (UK)
- linking research and teaching (UK)

There is a general detachment in these systems from research-related topics; only marginally is it treated as a subject related to teaching staff. But in the Norwegian model it is found that in the evaluation schemes, a considerable number of analysis elements can be traced back to research: strong research profiles in at least four different areas, the scope and experience in research training, and documented research activity and results [27].

The analysis thus generally reveals an imbalance in the focus of QA on the teaching function, to the detriment of the research function, which is considered limited to scientific staffing and doctoral experience [28].

A feature of the Dutch system is the possibility in evaluation to go beyond the areas established for verification, in order to encourage courses to develop a distinctive profile, both countries have made it possible to assess particular quality characteristics. These may include a high level of internationalisation, a special link to the professional field, excellence in course content and teaching, a special learning concept or a theme such as sustainability if incorporated into the degree course. The assessment of special quality features is a bonus and does not influence the basic quality assessment [10].

On the other hand, the areas considered at a higher level, i.e. the audit of the institution, concern requirements relating to

- the integration of QA practices in the strategy and in all core areas of the institution, as well as in all organisational levels
- the information system
- presence of monitoring, evaluation and improvement activities to verify that all courses of study meet the requirements
- use of QA outcomes to improve quality and resolve critical issues, but also to inform the evaluation phase and for strategic development (Norway)
- the participation of internal and external stakeholders in QA processes, but also the reporting of useful information to these stakeholders (Portugal)

C. QA Procedures

The QA procedures in the analysed countries' systems consist of a combination of internal quality assurance, self-evaluation and external evaluation.

Each institution is responsible for carrying out an internal evaluation, which is reported in a self-evaluation report during the external visit. External evaluation, for which the National Evaluation Agency is responsible, takes place cyclically (in Portugal, one cycle lasts six years, with the first five focusing on course evaluation and the sixth on institutional evaluation).

Research on the subject has shown the importance of external QA references for the design and implementation of internal QA systems; this phenomenon of coercive isomorphism consists of institutions being 'forced' to follow and adopt what is proposed externally in terms of QA frameworks and guidelines [29].

The accreditation process in the Netherlands begins with the search for an agency to handle the external evaluation, as this is a system in which there are several quality agencies and each institution is free to choose which one to engage for accreditation.

In Portugal, the external evaluation is based on the work of external evaluation teams (EWCs), combining documentary analysis of self-evaluation reports and a visit to sites, with interviews with management and focus groups, including students, teachers and other stakeholders.

Common to Portugal and the Netherlands is the distinction between who performs the external evaluation (commission of external experts) and who decides on accreditation, having direct responsibility for it (i.e. the National Evaluation Agency).

The QA procedures in Norway are essentially based on a system of audits of the institutions' internal QA systems and not on the quality of the institution; this is in light of the belief that an effective internal QA system consequently entails the quality of the work performed. This method may have a weakness in that it is indirect and thus assumes conformity between the quality of education and the work of the quality assurance system. The quality standards that NOKUT has set for both the evaluation of quality assurance systems and the accreditation of institutes and study programmes may, for example, not be able to identify the actual quality of the education offered [30].

The methodologies used in the United Kingdom are more articulated and reflect the varying territorial context in which the national QAA agency operates, as well as the different types of institutions undergoing accreditation. There are in fact: (i) institutional audits (England and Ireland nords); (ii) performance audits, aimed at examining the level of maintenance of the standards of the awards given to colleges; (iii) Integrated Quality and Enhancement Review (IQR) is the review method for HE institutions; (iv) ELIR, an institutional review carried out in Scotland.

Specifically, ELIR is a comprehensive review programme managed directly by the institutions and is based on a set of quality criteria and includes a substantial voice for students. "ELIR is a thematic enhancement programme aimed at developing and sharing good practice in learning and teaching" [29]. It is a review of all Scottish HE institutions over a four-year period.

The purpose of ELIR quality systems is to improve students' experiences and their learning. Institutions, during accreditation, prepare a document called a 'reflective analysis', which aims to highlight the specific and distinctive features, as well as strengths and weaknesses of how the university improves the student learning experience and how it examines and monitors the quality of teaching and learning.

D. The Use of QA Results

The use of QA results is closely linked to the objectives and goals set.

The primary use relates to the improvement and growth of individual institutions that on the basis of the outcomes of internal and external QA processes should find direct benefits for the improvement of their performance in teaching, research and third mission.

In general, in terms of external use, it is recorded that no direct link exists between quality assessment and funding. It is assumed that the evaluation system should not be hampered by potential direct consequences on decision-making and funding. If there were direct links to funding and other aspects of government decision-making, these could all too easily lead to opportunistic behaviour on the part of HE institutions, completely undermining the effectiveness of the quality assessment system. This, however, meant that the perception of the impacts of the quality system was generally low. Thus, a way was found to escape what can be called 'the quality assessment dilemma': "Without the expectation of real consequences, there is a lack of incentives to organize quality assessment; with the expectation of real consequences, quality assessment will turn into a power game" [31]. This emphasizes the need to focus on how the mechanisms of preference formation work, since 'individuals do not act solely in a calculating way, but in most cases in accordance with routines, scripts and patterns (i.e. choices)' [32]. The need to act on the promotion of quality culture is therefore crucial in order to make people understand the usefulness of quality work.

To ensure that quality assurance is taken seriously in the absence of a direct threat, in the Netherlands the Inspectorate for Higher Education (IHO), on behalf of the Ministry of Education and Science, was responsible for the so-called meta-evaluation of the system. Accordingly, the IHO regularly examined the peer review reports of the visiting committees and the extent to which institutions utilised the results of internal and external evaluations. In essence, it examined how the institutions reacted to the recommendations and conclusions of the external evaluation committees [33].

The most incisive impacts are those in negative terms, i.e. the extreme consequences of negative accreditation. In all countries, in the event of failure to meet basic quality standards a course of study will no longer be able to enrol new students, degrees recognised by the national government will no longer be awarded and, as in the case of the Netherlands, funding for the course will be discontinued [10].

Interestingly, in the international comparison, quality assurance judgements were not linked to any government incentives or sanctions, except for the (at first very remote, later somewhat more threatening) control option of discontinuing recognition and funding of a study programme after a prolonged period of low quality or following a failure to meet expected quality standards. In the experience so far, there are no or only a very limited number of cases of 'red cards', possibly some warnings were issued and some HE institutions withdrew weak programmes beforehand or reorganised them.

In the UK, auditing has increasingly been seen as a tool that

can be used to make institutions, at least formally, more accountable to their stakeholders [8].

IV. CONSIDERATIONS ON QUALITY CULTURE ASPECTS

The Portuguese experience of implementing QA in HE can be defined as an experience of 'induced' practice to adapt to external international requirements, born under the international impetus given by the Bologna Process, but especially by the ESG.

The focus on the conformity of institutional processes with formal requirements has led to the transformation of internal quality assurance processes into a bureaucratic exercise in some cases [34]. This is particularly evident in cases where more emphasis is placed on formal, structural and procedural aspects - thus on the organisation of the quality system and the information management system - and less on shared values and commitment to improvement [35]. The Portuguese experience has shown that in institutions where there is a strong group controlling internal QA, with the participation of stakeholders as well, the quality culture is more responsive [35], and therefore more capable of making the system aspects actually useful and utilised.

For the proper implementation of ESG, therefore, national regulations are not enough; it is necessary to have additional aspects implemented by institutions such as: familiarity with the ESG principles, administrative capacities and (quality) policy designs [36]. Such considerations are related to the theory of scale [37] according to which actors - in this case HE institutions - are active agents who are able to shape policies such as ESGs and their implementation according to their specific interpretations, interests and contexts that shape their policies and experiences [38].

The application of ESG cannot therefore be considered as a universal and homogeneous practice for all institutions; it implies, in fact, the exercise of a real commitment to improvement, stratified at all levels of the organisation, with skills gained in this context. Otherwise, the risk is that quality assurance processes are sometimes implemented only during the preparation of the external evaluation, thus lacking the necessary commitment and support of the institution to create an 'educational community' in QA [39].

The Dutch quality assurance process in HE offers an interesting model for other countries to consider because it creates legitimacy for the use of quality-oriented judgements in internal decision-making processes. Although the Dutch model is the result of government initiatives and pressures for accountability, it provides an interesting positive example because Dutch institutions have been able to satisfy the government's desire for accountability with their own needs for internal institutional improvement [33]. Although, in 1995, Vroeijenstijn's book "Improvement and Accountability: navigating between Scylla and Charibdis" [40] pointed out that the functions of improvement and accountability were impossible to combine as they involve the use of two different approaches.

The Dutch experience can be seen as starting from the heart of the university system, the institutions, with a strong

motivation for improvement; only later did international legal and regulatory intervention intervene in the system by defining the contours of accreditation and defining external control procedures.

The strong maturity of the Dutch system has made it possible to speak today of a system that now aims at the simplification of QA practices and increased 'confidence' in the quality of the Dutch higher education system. The update of the accreditation system, introduced in February 2018, in fact provides for the accreditation of programmes for an indefinite period of time, instead of the six-year period previously planned. This update 'aims to support staff and student ownership in programmes and institutions', but also seeks to help reduce the administrative burden of the accreditation process [41].

In terms of simplification in response to the intensification of bureaucratic pressure due to the introduction of accreditation practices, NVAO worked to create a flexible framework of requirements in limited numbers and with reference to existing documents only, instead of having to write an extensive self-assessment report.

In terms of simplification, the new evaluation/accreditation cycle outlined by the Portuguese Evaluation Agency, conducted in the period 2018-2023, based on the principles of risk management and institutional accountability for the quality of educational provision, introduced simplified procedures. In particular, the system is based on a sampling system combined with institutional audits. These procedures are adopted for institutions with better quality indicators, in terms of qualification of teaching staff and quality of research carried out, as well as performance in the first evaluation/accreditation cycle and duly certified internal quality assurance systems.

Another development in terms of simplification, but we can also call it a quality culture, is the so-called 'constructive dialogue', i.e. a moment of discussion within the QA process, where external evaluators and representatives of the programme being evaluated have the opportunity to discuss potential improvements in a more informal and relaxed context, without formal consequences for the outcome of the accreditation process. This dialogue implies that programme managers are made aware of the outcome of the preliminary evaluation prior to the on-site visit, so that the dialogue of the interview focuses not on defining and responding to mutual responsibilities, but on development and improvement [42].

In preparation for the visit of external experts, common to all experiences of QA systems in the various countries analysed is the preparation of a self-assessment report by the institution, with the collection of existing documentation and/or the preparation of an ad hoc report; the purpose of the self-assessment is not only to prepare the lecturers for the visiting committee, but also to stimulate internal quality management [43]. Internal quality assurance is thus the main vehicle for the development of a quality culture, which through, on the one hand, the definition of procedures, organisations and tools and, on the other hand, the dissemination of competences, values and attitudes, enables the institution to realise its vision of education. The more this culture is established, the more the external verification systems can relax the checks and

significantly reduce the criteria used for the accreditation of individual programmes, keeping the audit almost exclusively at the institutional level.

An important feature introduced in the current new audit models in Norway (2018-2024) concerns the sharing of evaluation outcomes among peers. In essence, institutions are involved in the audits by groups, organised to aggregate institutions with similar characteristics. Both during and after the audits, institutions are encouraged to compare their activities within the QA system, the resulting documentation and the good practices found. NOKUT believes that this comparison has enormous potential for developing new ideas and for mutual inspiration in quality assurance work.

A further form of collaboration and creative drive for improvement was realised in the Netherlands in the long development of internal quality assurance (before the advent of compulsory accreditation). In particular, the work of external review committees was very useful in order to develop proposals for ideas from outside the individual institutions and a positive push towards improvement occurred [44]. The goal of improvement had indeed materialised due to the dense exchange of ideas, cooperation, joint projects and action programmes developed by the institutions from the outcomes of the evaluation work of the external review committees. In particular, it was found that these reports focused exclusively on strengths and points of attention and not so much on weaknesses.

The British approach provides an interesting experience of how a QA mechanism that initially appeared to be purely accountability-oriented and thus of limited effectiveness [45] has, over time, proved to be a strategic driver for the revision and development of the HE system, as was also the government's intention. Research such as that conducted by the Quality Support Centre of the Open University [46] has shown how quality assessment in the UK has led to an important and complex review process of each subject area taught in UK universities. Following this important, but also costly, process, the onus was placed on individual institutions to conduct their own internal review processes in a systematic manner.

V. CONCLUSIONS

Experience with the implementation of quality assurance systems in HE in several European countries provides some interesting insights into quality research.

First of all, a double track of such QA systems can be considered, especially starting from the international indications deriving from the Bologna Process in the first place and then from the directives given by the ESG (European Standards and Guidelines) in the field of internal and external QA. The double track refers to the dual objective of improvement and development, i.e. responsibility and 'accountability' towards the main stakeholders of the education system, first and foremost the governments and the system's funders.

The internal self-evaluation procedures, the true heart of the activation of a culture of quality in the institutions, can then be traced back to the first track, as well as the external evaluation

procedures through commissions of external experts, which precisely because of their third-party character make it possible to introduce new ideas and activate the sharing of suggestions and impetus for the resolution of any critical issues. The outcome of these procedures has an immediate and concretely visible impact on the development of the whole of the activities in which university action is carried out and not only on the areas subject to specific review; in fact, it has been seen how the activities of teaching and research and social impact can be considered in a consequential and closely connected manner as one the effect of the other and can be considered in a holistic approach that allows synergy to be found between these connections.

Connected to the second track is the objective of accountability to internal and external stakeholders. Therefore, the propensity of QA procedures is to account for the degree of fulfilment of the requirements specifically requested by the national QA system. It is for this reason that the main subject becomes, not so much the individual institution, but rather the National Evaluation Agency, which not only defines the quality requirements, but also verifies their fulfilment, making the final decision, on the basis of the work of the external evaluation commissions, on whether or not programmes and institutions are accredited. The resulting impact of these procedures is merely authoritative and a national recognition of the level of standards achieved.

Whatever the objective and the QA procedure adopted, in the presence of more or less pressing constraints from national legal and regulatory dictates, interesting practices have been found to be useful for the dissemination of a quality culture that make such QA procedures effective. These include elements such as peer-to-peer sharing and confrontation, the simplification of procedures and the complexity of paperwork to be produced, the skills and strength of the role entrusted to the internal teams working for QA, but also the innovative capacity that results from confrontation with third parties.

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