INTRODUCTION

In the 2003 Berlin Communiqué, European Association for Quality Assurance in Higher Education (ENQA\(^2\)) was mandated with the other members of the so called E4\(^3\)-group to “develop an agreed set of standards, procedures and guidelines on quality assurance, to explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies” and to report this through the Bologna Follow-up group (BFUG) in the next signatory states’ meeting in 2005 (Berlin communiqué 2003). In the 2005 Bergen meeting ENQA’s report *Standards and Guidelines for Quality Assurance in the European Higher Education Area* was fully endorsed by the ministers. Proposals of the report were welcomed and seen feasible (Bergen Communiqué 2005).

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\(^1\) This paper was originally prepared in 2005 for internal discussion within the project “Quality of Teaching in the European Higher Education Area” (2004-06; project leader: Erkki Berndtson, University of Helsinki). It has not been presented in any conference or published. We aim to rewrite the paper, but it is very much now in its original form. However, ENQA’s *Standards and Guidelines for Quality Assurance in the European Higher Education Area* have not been changed substantially, so we will still rely on our argumentation. We have made some changes in the text, when developments in the European Quality Assurance regime have required them.

\(^2\) Before 2004, ENQA was named European Network for Quality Assurance.

\(^3\) The E4-group consists of the ENQA, European Students’ Union (ESU), the European University Association (EUA) and the European Association of Institutions in Higher Education (EURASHE).
In this paper, we will examine ENQA’s *Standards and Guidelines* from the perspective of European academic community. We are interested in the ideological background of the standards and guidelines as well as in the consequences of ENQA’s recommendations for European institutions of higher education. As politicians and administrators are organising the European Higher Education Area, it is in the interest of scholars to analyse critically the quality of the work of quality assurance agencies.

**ENQA’S STANDARDS AND GUIDELINES IN A NUTSHELL**

The ENQA’s report of 41-pages has four chapters, an executive summary and an annex. The first chapter presents the context, aims and principles of the report. The second chapter develops the required “standards, procedures and guidelines” and is divided into three parts. The first two parts cover the standards and guidelines for internal and external quality assurance in higher education institutions, while the third part discusses standards and guidelines for quality assurance agencies themselves. The fourth chapter deals with the future of quality assurance in Europe.

*Context, Aims and Principles* reiterates the history of the document and acknowledges the E4-group’s and other agents’4 contribution. The chapter presents the quality assurance as a response to the worldwide concern about higher education’s effectiveness. Quality assurance is seen as an integral part of the Lisbon Strategy to make Europe “the most competitive and dynamic knowledge-based economy in the world”.

The second chapter, *European Standards and Guidelines* consists of three parts. In the first part, *European standards and guidelines for internal quality assurance within higher education institutions*, seven different standards and guidelines are introduced. These emphasise the explicit commitment to quality culture and the continuous nature of quality assurance. The procedures should be transparent, formal, documented and take into account the stakeholders’ interests. Every institution should have a quality policy statement and the implementation plan. Periodic review of the programmes and awards should include, in addition to self-evaluation, the feedback from employers and other labour market representatives. Evaluation should include, *inter alia*, learning outcomes,

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4 The other agents are the European Consortium for Accreditation (ECA) and the Central and Eastern European Network of Quality Assurance Agencies (CEE Network).
learning resources as well as student progress and achievement. Assessment of students should be consistent and based on public criteria. The assessment should measure the intended learning outcomes and be subject to administrative checks. The quality of teaching staff should be based on teachers’ substantial and pedagogical competences. The learning resources (physical and human) should be adequate, easily accessible and responsive to feedback. The resources should be routinely monitored and developed. Higher education institutions’ information systems should include in minimum the monitoring of students’ progression, employability and satisfaction, the teachers’ effectiveness, student population profile and the cost and availability of learning resources. The institutions should produce objective public information on objectives and substance of the programmes as well as the employability of the graduates (ENQA 2005, 15–19).

In part two, *European standards and guidelines for the external quality assurance of higher education* are discussed. First, the internal quality assurance systems should be taken into account in the external evaluation of institutions; if the external review can rely on the internal procedures, it does not need to be as intensive as it would be without internal quality assessment. The external quality assurance processes should be defined by all parties beforehand. Conclusions of the review should be based on recorded evidence. The agencies’ processes should be fit for purpose; different good practises, such as the careful selection of competent and diversified group of experts and the participation of students, are listed. The reporting should be understandable and accessible to all. Finally, there should be predetermined and consistent follow-up procedures and periodic reviews on cyclical basis (ENQA 2005, 19–22).

Part three describes the *European standards and guidelines for external quality assurance agencies* and urges the external quality assurance agencies to take into account the external quality assurance processes described above. External quality assurance agencies should have an official status, they should practise quality assurance on a regular basis and should have enough resources and an explicit mission statement. In addition, agencies should be independent from the interests of stakeholders, such as, higher education institutions and ministries. The processes for the external quality assurance are expected normally to include self-assessment, external assessment by an
expert group, publication of a report and agreeing on the follow-up procedures. Finally, the agencies should also have procedures to prove their own accountability (ENQA 2005, 23–26).

The third chapter, *Peer Review System for Quality Assurance Agencies*, introduces three concrete proposals for action. The experience of different international and US organisations[^5] is said to have been useful in formulating these. The first one is cyclical review of agencies. Reviews should take place in five years interval, and the initiative-maker should be the agency itself or the national government. If there is no initiative, it should be taken by the ENQA for its own members and the European Register Committee in case of the other agencies. The second proposal deals with the creation of a register of external quality assurance agencies operating in Europe[^6], which would divide agencies in two categories: the peer-reviewed agencies that meet (or do not meet) the European standards and the (yet) non-reviewed agencies. (ENQA 2005, 30–31) The register “would meet the interest of higher education institutions and governments in being able to identify professional and credible quality assurance agencies operating in Europe” (ENQA 2005, 30). The admissions to the register would be decided by the European Register Committee, “a light non-bureaucratic construction”, which would have nine members, consisting of members from the E4-group and from the “organisations representing European employers, unions, professional organisations and government representatives”. ENQA would act as the Secretariat (ENQA 2005, 31). The third proposal is the establishment of European Consultative Forum for Quality Assurance in Higher Education. The consultative and advisory forum would consist of the E4-group and other organisations (ENQA 2005, 33[^7]).

[^5]: International Network for Quality Assurance Agencies (INQAAHE), the International Association of University Presidents (IAUP), the Council for Higher Education Accreditation in the United States (CHEA), the Organisation for Economic Co-operation and Development (OECD) and the United Nations Educational, Scientific and Cultural Organization (UNESCO).

[^6]: In the 2007 London Follow-up Conference, the Ministers endorsed the creation of the European Quality Assurance Register for Higher Education (EQAR). Founded by the E4-group, it has been operative since 2008.

[^7]: In 2006, the E4-group organised the first European Quality Assurance Forum (EQAF) to discuss Quality Assurance between different stakeholders. Since then the Forum has been organised yearly. The eight Forum will meet in Gothenburg, Sweden, in November 2013.
BACKGROUND OF QUALITY ASSURANCE IN EUROPE

The Bologna Process made possible a European wide institutionalisation of QA. At least three major players in spreading the idea of QA can be identified: OECD, EU and American models.

The OECD’s power is above all power to frame politics. It produces language and terminology for international higher education politics. Thus the conferences arranged by the OECD have become important ways of influencing the general higher education discourse (Henry et al. 2001, 128–130). One can argue, as Rinne and Simola (2005, 16) do, that the language in national discourses has become a kind of OECD/EU-speak.

The Australian research group Miriam Henry, Bob Lingard, Fazal Rizvi and Sandra Taylor argue that quality became a prominent issue in the OECD during the 1980s with the influence of Americans. However, the focus was first in basic education. In the 1990s quality found its way into the Programme on Institutional Management in Higher Education (IMHE) (Henry et al. 2001, 76). Performance indicators were integrated into the quality control to form a “global model of quality”, which included a

“meta-level assessment independent of government; self-evaluation; peer review including site visits from external experts representing appropriate constituencies; non-ranked reporting of results which may be published or confidential; non-linked relationship between performance and funding thus avoiding a [in van Vught’s terms] ‘compliance culture’” (Henry et al. 2001, 77).

Rhoades and Sporn recognise the import of US-type quality assurance with the exemplary characteristics of institution’s self evaluation, peer-review and external quality assurance body as do Henry et al. On the other hand, Rhoades and Sporn see the model’s metamorphosis into European type, with two distinguishing features. The first is the emphasis on standardisation and the second is the link between quality and allocation of resources. In the United States, the focus has rather been on ensuring minimum standards and efficiency than harmonisation and quality. Rhoades and Sporn argue that linking allocation of resources to quality in Europe is due to stronger nation states. (Rhoades & Sporn 2002, especially 382–383.) Another reason for the connection to resource
allocation is due to the financial crisis during which idea of QA was spread in Europe (see Vedung 2004, 245).

Because of European cultural differences, there is also extra pressure for quality assurance. Guy Neave has argued, that

“it is virtually certain that Europe’s universities will accelerate along the path of differentiation. As they do, they will certainly need new bodies to ensure accountability, answerability, and not least, their own representation across these different communities or levels within them” (Neave 2003, 160).

However, the notion of quality has become more unanimous as the Bologna process has developed. ENQA’s Standards and Guidelines fit well with this development. ENQA’s instructions seem to follow the developments noted in the earlier research quite precisely. In forming the European QA model, there was a strong influence from the EU and Americans through the OECD. The European model became a model of self-evaluation, peer review and the use of external quality assurance agencies with national and cultural differences. We have no direct evidence that ENQA’s document is “EU/OECD-speak” although the promoted QA mode is what Henry et al. call “global”. However, EU’s interests are strongly embedded in the Standards and Guidelines. EU has funded ENQA through Socrates-programme and the QA is considered to be one of the key aspects of Lisbon strategy.

**STANDARDS AND GUIDELINES AS DISCOURSE OF POWER**

*Power Discourses in European Higher Education*

Quality discourse is persuasive in two ways. First, who would like to oppose better quality? Second, quality is often seen as a necessity due to economic facts. Louise Morley has noted, after interviewing teaching and administrative staff in Great Britain’s higher education institutions, that it is very difficult to resist the quality discourse for the two reasons above. Morley sees quality assurance as a discourse, which has formative and regulative power (Morley 2003, 164–166; see also Rinne & Simola 2005, especially 16–18). In Morley’s view the EU has discursively connected problems of modern society with the lack of educational possibilities. The discourse on the problems of learning legitimises the quality discourse (Morley 2003, 11).
The quality discourse is not neutral. John Brennan and Tarla Shah (2000, 13), for instance, see the organising of quality assessment procedures as a re-organising of society’s power structure. As Taina Saarinen concluded in her critical discourse analysis of several Bologna process’ papers:

“QA will always represent some actor’s interest, and one of the ways of grasping that interest is through a critical discourse analysis of the documents produced within the process” (Saarinen 2005, 200).

The “Problematisation” of ENQA’s Standards and Guidelines

What is the basic problem in the Standards and Guidelines? How does the document legitimise its recommendations? In short: what is its “problematisation” (cf. Walters 2005, 4)? Reading the text carefully, one may argue that the report is based on the claim that institutions of higher education are today under pressure and they need to legitimise their existence. As the higher education has grown everywhere, the question of its financing has become crucial. This is the case especially in those European countries where the financing has been a responsibility of the state. Quality assurance can solve this problem as

“The proposals…offer higher education institutions recognition and credibility and opportunities to demonstrate their dedication to high quality in an increasingly competitive and skeptical environment” (ENQA 2005, 34).

“Problematisation” makes possible to dictate rules of behaviour (Foucault 1999, 122–124). When skepticism towards quality is a problem, the rules of behaviour can be dictated through QA. Thus the assumed existence of scepticism is crucial for the whole idea of QA.

The second, and a partly contradictory premise, is that Europe needs high quality higher education institutions in order to compete worldwide:

“Quality assurance in higher education is by no means only a European concern. All over the world there is an increasing interest in quality and standards, reflecting both the rapid growth of higher education and its cost to the public and private purse. Accordingly, if Europe is to achieve its aspiration to be the most dynamic and knowledge-based economy in the world (Lisbon Strategy), then European higher education will need to demonstrate that it takes the quality of its
programmes and awards seriously and is willing to put into place the means of assuring and demonstrating that quality. The initiatives and demands, which are springing inside and outside Europe in the face of this internationalisation of higher education demand a response” (ENQA 2005, 9).

Higher education institutions are needed, but they have to prove their quality in order to be financed. From this follows the demand for quality assurance. At the same time, Standards and Guidelines present as a fact that quality assurance automatically produces quality. There is, however, no analysis of the causal factors between quality assurance and the quality itself. The relationship is given as an accepted truth. From this perspective, ENQA’s recommendations are based on the Foucauldian triangle of power-truth-right (Foucault 2003, 24). The truth does not need to be argued, as the claim for the true knowledge and for the right action is based on power.

The Style of Standards and Guidelines

William Walters has written on the EU 2001 “White Paper on Youth” analysing the Paper’s genre, its style and the kinds of identities it constructs for actors as well as for readers (Walters 2005, 6). Two different genres can be found in the Paper. The first one is corporate-managerial, presenting the EU “as though it were an enterprise operating in the uncertain and sometimes turbulent world of the global economy” (Walters 2005, 6). The document is framed as a set of challenges, which acquire a kind of an exogenous quality as processes without actors. As Walters writes,

“These processes happen and, it seems, we have no alternative but to respond them as best we can. The processes are places beyond controversy, beyond the contingencies of rival political interpretation. There is no debate on the character or status of these challenges. They are given” (Walters 2005, 7).

From this follows that the corporate-managerial style constructs our identity as “we” who must face challenges together. At the same time policy alternatives are constructed as responses to challenges which are not questioned. Exactly the same logic can be found in ENQA’s Standards and Guidelines.

8 For instance Rajani Naidoo and Ian Jamieson (2005, 272) refer to their preliminary results: “quality of the physical environment and greater transparency in academic procedures [– –] are necessary but not sufficient for high quality learning which is based on intrinsic and hard to measure factors such as commitment, professional responsibility, empathy and knowledge and enthusiasm for the subject”.

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This is also the case with the second genre which Walters finds in the Paper and what he calls the \textit{consultational}.

“Whereas the adversarial is about being tough, strategic, and decisive, then consultational is open, inclusionary, and participatory” (Walters 2005, 7).

In the case of ENQA this is framed in the following way,

“use should be made, wherever possible, of the results of institutions’ own internal quality assurance activities – if higher education institutions are to be able to demonstrate the effectiveness of their own internal quality assurance processes, and if those processes properly assure quality and standards, then external processes might be less intensive than otherwise“ (ENQA 2005, 19).

At the same time it is emphasised that “institutional autonomy should be respected” and that quality assurance agencies are “to assist higher education institutions in managing and enhancing their quality and, thereby, to help to justify their institutional autonomy”.

However, as in the case of the EU’s White Paper on Youth, the \textit{Standards and Guidelines} shows that the corporate managerial and consultational styles co-exist in tension. The consultational implies an open, inclusive process in which the future is up for debate. But the terms of the debate have been predetermined by the corporate-managerial. The latter has already defined the present terrain as a set of imperatives and ‘challenges’ such as ‘globalization’ which demand ‘our’ response” (Walters 2005, 9-10).

If the style constructs the rules of discussion, another way of framing the discussion are the classificatory mechanisms used in the text, what is presented and what is left out (Walters 2005, 10). In the case of \textit{Standards and Guidelines} one of the most important aspects of the universities which is not discussed at all, are the financial resources of European higher education institutions.

Another missing element is the role of the academic staff. Teachers are not mentioned in the text at all, except that institutions should have ways to guarantee that staff involved with the teaching of students is qualified and competent to do so. Instead, the key players for ENQA are students and other stakeholders. The quality of teaching must be developed and improved for students, for employers and for society at large, their interests must be safeguarded. That is why it is also important to involve students and other stakeholders in
the quality assurance system. But there are no demands for students and other stakeholders. Students are not required to study hard and society is not required to provide resources for institutions of higher education. Instead, institutions “should have the means to remove” incompetent teachers “from their teaching duties if they continue to be demonstrably ineffective” (ENQA 2005, 17).

There are some twenty demands for higher education institutions in Standards and Guidelines. Institutions have the responsibility to encourage the culture of quality, to demonstrate their accountability, to take account of special needs of different student groups (“modes of delivery” – full-time, part-time, distance-learning, e-learning, academic, professional), to monitor the progress and achievement of students, to have regular feedback from employers, labour market representatives and other relevant organisations, to maintain information systems of student progression and success rates, employability of graduates, students’ satisfaction with their programmes, effectiveness of teachers, profile of student population, learning resources available, their costs, to design student assessment procedures to measure the achievement of intended learning outcomes, to have clear and published criteria for marking, not to rely on the judgments of single examiners, etc., etc.

The problem from the perspective of universities is that these demands either contain principles which are self-evident for higher education institutions (“should develop curriculum and programme design and content”) or they increase hierarchical observation, normalising judgment and disciplinary mechanisms within the academia (cf. Foucault 1977).

Legitimacy and Roles
The universities are to be under constant scrutiny due to severe external doubts about their quality. Although the universities have autonomy, it doesn’t reach the area of QA. The final say in QA is firmly embedded in quality assurance agencies, which are “to assist higher education institutions in managing and enhancing their quality and, thereby, to help to justify their institutional autonomy” (ENQA 2005, 13). QA is a precondition for university autonomy. In fact, this applies also to quality assurance agencies:
“The European standards for external quality assurance agencies [− −] must not reduce the freedom of European quality assurance agencies to reflect in their organisations and processes the experiences and expectations of their nation or region. The standards must, though, ensure that the professionalism, credibility and integrity of the agencies are visible and transparent to their stakeholders and must permit comparability to be observable among the agencies and allow the necessary European dimension.”

The legitimation of ENQA is founded on the legitimacy of its member agencies. ENQA doesn’t set any rules of behaviour for itself in the *Standards and Guidelines*. However, ENQA is presented as a neutral and hard-working, even humble, secretariat just doing its job: “ENQA has been able to build on the state-of-the-art consensus arrived at during the 1990s” (ENQA 2005, 23); “ENQA will perform the secretarial duties for the [E4] committee” (ENQA 2005, 32); “there will be a considerable and challenging workload for ENQA[, E4 and other key stakeholders]” (ENQA 2005, 35). Also, the word autonomy is not used in context with ENQA. “Autonomy” is used only when speaking of the necessity for QA and the need for flexibility in the *Standards and Guidelines* (ENQA 2005, e.g. 10 and 14). ENQA doesn’t need to justify its existence as do all the other actors in the text. ENQA seems to be working under the legitimation of a global agenda, which cannot be questioned.

**THE GROWTH OF THE QUALITY ASSURANCE BUREAUCRACY**

The *Standards and Guidelines* makes also demands for quality assurance agencies. Their role, however, is presented as “to improve the education available to students in higher education institutions” and “to make external quality assurance more transparent and simpler to understand”.

The document is in fact a way to strengthen the growth of a system of evaluative power mechanisms. ENQA’s recommendations will create a system in which:

- higher education institutions constantly work with internal quality assurance
- same institutions will be subject to external review regularly. There will be self-evaluations, site visits, draft reports, published reports and follow-up reports on a cyclical basis
• the external reviews are conducted using the help of quality assurance agencies
• in order to guarantee the high standards of quality assurance, agencies themselves must be submitted to a periodical review. Here the ENQA should have a role, as “it is essential that the task of appointing the experts be given to a third party outside the agency involved. This third party could for instance be ENQA or an agency not involved in the process” (ENQA 2005, 30).

At the same time

“Agencies should be independent to the extent both that they have autonomous responsibility for their operations and that the conclusions and recommendations made in their reports cannot be influenced by third parties such as higher education institutions, ministries or other stakeholders … While relevant stakeholders, … particularly students/learners, are consulted, …, the final outcomes of the quality assurance processes remain the responsibility of the agency” (ENQA 2005, 25)

Furthermore, the experts should be competent to perform their task (carefully selected, trained international experts) and they “should have adequate and proportional resources” (ENQA 2005, 20-24).

In fact, the Standards and Guidelines create a large hierarchical quality assurance system, which gives work for thousands of evaluators and causes unnecessary burden for scholars. There are some 4000 institutions of higher education in Europe. If all these will be evaluated periodically, it will produce thousands of self-evaluations, site visits and reports.

THE CONSEQUENCES OF ENQA’S STANDARDS AND GUIDELINES FOR HIGHER EDUCATION INSTITUTIONS IN EUROPE

One of the problems of the Standards and Guidelines is that it is an example of one-size-fits-all ideology,

“The standards and guidelines are designed to be applicable to all higher education institutions and quality assurance agencies in the Europe, irrespective of their structure, function and size, and the national system in which they are located” (ENQA 2005, 11).
The problem is, however, that institutions are different. As recommendations are used for political purposes, some institutions always suffer. Take for instance the demand that institutions should take account of special needs of different student groups (“modes of delivery” – full-time, part-time, distance-learning, e-learning, academic, professional). Some institutions may not want to do that for good reasons. But that can be used against them.

Colin Diver, President of Reed College in the United States, explains in his article “Is There Life after Rankings” (Diver 2005), why his College has decided not to participate in the annual *U.S. News & World Report* ranking of higher education institutions. The report has become one of the most closely watched rankings in the country and it is evident that most American universities and colleges strive to get as good a ranking as possible. Diver, however, gives three reasons, why the Reed College has decided not to cooperate with the journal’s ranking system.

First, the college saves the trouble of filling out U.S. News’s questionnaire, which consists of 656 questions and also asks for a peer evaluation of other higher education institutions. Besides, a peer evaluation is a random process in any case. As Reed writes:

“I wonder how any human being could possess, in the words of the cover letter, ‘the broad experience and expertise needed to assess the academic quality’ of more than a tiny handful of these institutions. Of course, I could check off ‘don’t know’ next to any institution, but if I did so honestly, I would end up ranking only the few schools with which Reed directly competes or about which I happen to know from personal experience. Most of what I may think I know about the others is based on badly outdated information, fragmentary impressions, or the relative place of a school in the rankings-validated and rankings-influenced pecking order”.

Secondly, non-cooperation gives freedom from a temptation to game the ratings formula. Diver gives examples of how various schools have distorted their procedures, creatively interpreting instructions or even misreporting information. This is what Jeliazkova and Westerheijden describe as a problem of external reviews, institutions easily resort to “window dressing” (Jeliazkova & Westerheijden, 434). Cheating becomes a way of life.

Thirdly, the most important reason for staying outside the evaluation game is, however, the freedom to pursue the college’s own educational philosophy. In the Reed case, the
withdrawal from the ranking game seems to work. At the end of his article, Diver is able to write that

“Before I came to Reed, I thought I understood two things about college rankings: that they were terrible, and that they were irresistible. I have since learned that I was wrong about one of them”.

Would Reed’s strategy work in the European Higher Education Area? ENQA’s Standards and Guidelines do not unfortunately give very much hope about that. In fact, Quality Assurance has emerged as a new system of self-control in the European higher education. The autonomy of universities is autonomy under control. This kind of power can be described as a Foucauldian type of systemic power. Universities have trapped themselves into a labyrinth of power mechanisms. Academics are more and more controlling themselves through the disciplinary power of quality assurance mechanisms.

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