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## **Applying the ESG outside Europe**

*A REFLECTION ON THE APPLICATION OF THE EUROPEAN STANDARDS AND GUIDELINES FOR QUALITY ASSURANCE IN COUNTRIES OUTSIDE THE EUROPEAN HIGHER EDUCATION AREA*

### **1. INTRODUCTION**

In Spring 2018, AQAS underwent its first international accreditation procedure in Africa, making it the fourth continent the accreditation agency has worked on. The Master and PhD programmes of the West Africa Centre for Crop Improvement (WACCI) at the University of Ghana, Accra, successfully received an international accreditation. The programmes are supported by the World Bank and have now been accredited internationally as a further step in the Centre's effort to continuously enhance its quality. Four experts along with AQAS consultants led various talks with university and WACCI representatives as well as students and labour market representatives to get to know and to evaluate the Centre and its academic offerings and to provide recommendations for further improvement.



The panel of experts and AQAS consultants meet the management of the University of Ghana and WACCI.

International accreditation procedures have gained importance in the works of European accreditation agencies in recent years. AQAS, for example, has provided accreditation of Bachelor, Master and PhD programmes in Austria, Northern Cyprus, Turkey and Moldova as well as in Chile, in Oman, in Kazakhstan, in Russia and in Ghana, as just mentioned. In all cases, cross-border accreditation is based on the "European Standards and Guidelines for Quality Assurance in the European Higher Education Area" (abbreviated as ESG) as common standards for internal and external quality assurance in learning and teaching. The ESG have been drafted by several European associations and networks, among them ENQA (European Network for Quality Assurance in Higher Education), EUA (European University Association), ESU (European Students' Union) and EURASHE (European Association of

Higher Education Institutions in Europe), and have been agreed upon by all 48 participating European states of the European Higher Education Area (EHEA). Whenever AQAS works outside its country of origin, Germany, the ESG constitute the direct basis for accreditation.<sup>1</sup> In recent years, the success of the ESG has been reflected by the increasing demand for international accreditation based on the guidelines, within the EHEA and especially beyond – at least from the perspective of an accreditation agency operating worldwide.

What it means to apply the ESG outside the EHEA and what kind of (exemplary) conclusions may be drawn from this is the content of this reflection. It will share some of the experiences gathered in procedures which may be useful for further external quality assurance procedures outside the EHEA. It is meant as a “reporting-back”; however, without any claim to representativeness or completeness. It is neither based on the experience in one single accreditation procedure, nor based on a specific country AQAS has worked in. Based on a short outline of the ESG, the reflection will touch in its first part upon procedural aspects which is followed by a discussion of the implementation and application of ESG standards.

### About AQAS

AQAS is a German-based accreditation agency providing programme and institutional accreditation. It is registered with the German Accreditation Council as well as with the European Quality Assurance Register for Higher Education (EQAR). EQAR, founded by the European ministers for education, constitutes a kind of *Whitelist* for European quality assurance agencies: members on the list continuously undergo external accreditation by ENQA to ensure that they are working in compliance with the ESG (with regard to part 2 and 3 of the ESG). AQAS is also member of the European Consortium for Accreditation in higher education (ECA) and the International Network for Quality Assurance Agencies in Higher Education (INQAAHE). The agency engages in international networks and exchange and actively participates in the further development of the EHEA and its tools.

## 2. THE ESG AND INTERNATIONAL ACCREDITATION

The joint effort of 48 European countries to define and promote guidelines for internal and external quality assurance in higher education has been a major achievement in further developing the European Higher Education Area. The ESG serve as a reference for (external) quality assurance in all EHEA participating countries providing guidance for stakeholders involved, such as universities/higher education institutions (ESG Part 1) as well as quality assurance agencies and networks (ESG Part 2 & 3). While the ESG do not fulfil the function of replacing national regulations or imposing restrictions on national higher education systems, they help to establish a common set of standards and criteria on quality in teaching and learning and its external review in the participating countries.

Even though the ESG form a set of guidelines for quality assurance agreed upon by European stakeholders and defined against the background of the EHEA, they can be used in higher education systems outside the “Bologna area”. What kind of experiences, insights and conclusions this may evoke will be discussed in this article.

Part 1 of the ESG defines 10 standards for internal quality assurance on which programmes will be assessed (see below). The variety of higher education landscapes in the EHEA has been one of the main motivations to formulate *standards and guidelines* rather than criteria which allow to subsume and tolerate national characteristics.

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<sup>1</sup> The ESG constitute the reference for the German national criteria and are thus indirectly the basis for all kind of procedures and workflows of AQAS.

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## European Standards and Guidelines for Quality Assurance in the European Higher Education Area, Overview Part 1 Standards and Guidelines for Internal Quality Assurance

### 1.1 Policy for Quality Assurance

### 1.2 Design and Approval of Programmes

### 1.3 Student-centred Learning, Teaching and Assessment

### 1.4 Student Admission, Progression, Recognition and Certification

### 1.5 Teaching Staff

### 1.6 Learning Resources and Student Support

### 1.7 Information Management

### 1.8 Public Information

### 1.9 On-going Monitoring and Periodic Review of Programmes

### 1.10 Cyclical External Quality Assurance

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The motivation to obtain an international accreditation is certainly different to external quality assurance procedures required by national legislation and may include various aspects. An international accreditation is usually obtained *in addition* to a national one as cross-border quality assurance often does not substitute for national requirements.

It is thus often used as a kind of quality enhancement tool; external review from experts outside the national higher education system shall provide expertise and guidance. The focus is thus solely put on quality enhancement and the further development of programmes. It may be initiated by the university management as a strategic means or may be motivated by individual institutes or programme coordinators. An international accreditation is also often initiated by the wish to increase international acceptance of degrees and to foster mobility of students, staff and research activities. A positive result may have effects on the scope and composition of cooperation projects as well as on the general visibility of the higher education institution (HEI). By raising the profile of a programme an increase in student numbers and projects may be envisaged.

### 3. PROCEDURAL ASPECTS OF THE ACCREDITATION

In international procedures, AQAS applies agency criteria based on the ESG, more particularly based on Part 1. The AQAS criteria rephrase the rather general ESG criteria into more concrete and transparent indicators, which are more accessible for higher education institutions, experts and other stakeholders. AQAS criteria and indicators have been decided upon by the Accreditation Commission for Programme Accreditation of the agency.<sup>2</sup>

The criteria strictly adhere to the central tenet of the ESG that quality assurance lies with each higher education institution itself. A study programme is thus evaluated and judged based on the objectives

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<sup>2</sup> The Accreditation Commission for the accreditation of programmes decides statutorily about programme accreditations on the recommendations of the respective expert group and adopts accreditation processes and standards for the accreditation of programmes. The composition of all AQAS' commissions and internal units is based on the stakeholder principle in order to accommodate the different perspectives of the interest groups participating in accreditation procedures. AQAS therefore endeavours to include the different stakeholders into the structures and remit of the agency; academic representatives have the majority voice in all commissions.

defined by the HEI. Quality assurance measures used within a programme may thus reflect an institutions history, its structure and its unique approach to education.

The accreditation is based on the multi-step procedure as outlined in the ESG (Part 2): (1) a self-assessment by the HEI, (2) a peer review process including a site visit, (3) a report summarizing the results of the peer review and (4) a follow-up.

The procedure starts with the initial consultation of a HEI aiming for an ESG-based accreditation. As in all procedures, criteria and procedures will be provided to the HEI well in advance. Transparency is a key aspect in accreditation. In international procedures outside the EHEA, information on the procedure and the criteria is of particular importance. As HEIs are usually not familiar with the ESG and their application, and as national accreditation procedures may focus on other aspects more prominently, guidance prior to the procedure and in between is often required. Guidance in writing the self-evaluation report is often beneficial as well to make sure that experts receive all relevant information in a transparent and readable manner and that HEIs present themselves coherently.

The composition of the panel of experts follows the ESG standard of considering various perspectives by including all stakeholders, namely professors, students and labour market representatives. In addition to the academic expertise experts will be nominated by AQAS with regard to further characteristics. AQAS aims at working with experts who are already reasonably familiar with (international) accreditation procedures. It has often turned out that the process of carrying out external review in a foreign country requests a special social and cultural sensitivity. What is considered to be a face-threatening act, for example, can be interpreted very differently in different cultures. The familiarity of the experts with the academic standards of their discipline plus expertise with accreditation procedures and intercultural awareness are therefore crucial to facilitate the accreditation for all actors involved.

This last mentioned aspect is also one of the driving factors for AQAS to include at least one panel member who works in the country itself or is of native origin, a “national” expert so to say. The knowledge of the national higher education system and the ability to assess situations and put findings into perspective by a national expert is highly valuable. It helps to assess a study programme against the background of the individual higher education system. In some cases, misunderstandings or language barriers can be easily overcome with the help of a national expert. Quite frequently the expert from the labour market takes over this task and contributes to the panel of experts not only with deeper insights into what is requested from graduates by companies or organisations in the specific country but also by “interpreting” national issues to the international experts.

The ESG in their outline of standards and guidelines for external quality assurance explicitly define a student member as part of the expert group. The approach to include one of the key stakeholders as part of the evaluation team, the “recipient” of higher education, has been promoted within the EHEA successfully in the past years. AQAS has made positive experiences with student involvement in accreditation procedures because they usually put a special focus on questions which refer to the feasibility of programmes (e. g. student support, admission and certification procedures, assessment procedures).

Although AQAS works mainly with experienced experts, it devotes special attention on the adequate training of experts. They are informed well in advanced about the outline of the procedure, the criteria as well as about their role. Furthermore, national regulations will be provided, be it original documents such as higher education laws or AQAS summaries of national characteristic. This is provided regularly by AQAS several weeks prior to the site visit. Once on site, nearly half a day is allocated for a briefing of the experts and a first internal discussion of the programmes in preparation of the upcoming talks.

Furthermore, in preparation of the site visit, AQAS asks all experts to hand in a short preliminary statement on the application documents (i. e. the self-evaluation report, course descriptions, examina-

tion regulations and appendices) which summarizes the open questions which arose during the first screening of the documentation. These statements help the experts to structure the discussions and to make the best use of the time given on site.

During the (at least) two days site visit the experts will have separate talks with the university and faculty/institute leadership, with students, staff and labour market representatives to gain a comprehensive picture of the programmes offered and to gather all information relevant for an assessment. Afterwards, the experts will provide the key aspects in a short oral feedback to the university so that the responsible staff members learn about the strengths and weaknesses of the programmes.

After their return from the site visit the experts are asked to lay down their evaluations in a written report which summarizes the assessment of the following aspects:

1. Policy & Procedures for Quality Assurance
2. Quality of the Curriculum
3. Learning, Teaching & Assessment of Students
4. Student Admission, Progression and Certification
5. Teaching Staff
6. Learning Resources and Student Support
7. Information

At the end of the report the panel of experts provides a recommendation for accreditation to the Accreditation Commission of AQAS. This commission, which consists of representatives of higher education institutions, of labour market and of student representatives, is the core unit of an agency as it is the decision-making body on the accreditation. The commission has four options to decide:

1. an unconditional accreditation
2. a conditional accreditation
3. a postponement of the decision
4. a denial of accreditation

The first two options cover a valid accreditation but nevertheless may require some effort in case a conditional accreditation should be the outcome. This means that a programme complies with the ESG on a general level but some shortcomings still have to be overcome so that the programme will fully adhere to the standards in the future. AQAS has implemented a follow-up procedure for each condition. HEIs are given nine months to hand in a documentation which shows the fulfillment of the conditions. If this compliance cannot be reached, the accreditation will be withdrawn.

In case shortcomings are more substantial and may not be addressed within nine months, the decision for accreditation may be postponed for 18 months. In this time frame the HEI may adjust the programme and hand in a revised documentation.

A denial of an accreditation only happens when the shortcomings are so severe that a programme may have a negative impact on the career of students and/or if resources, substantially needed to run a programme, cannot be improved within a realistic time frame.

In the accreditation system in Germany, more than 80% of the (AQAS) procedures end with an accreditation bound to conditions, which is perceived as a positive element of quality enhancement of the programmes and not as a “second class accreditation”.

#### **4. THE ESG OUTSIDE EHEA – SOME FINDINGS**

The ESG have been defined in the context of and as part of the EHEA. They are thus originally meant to be considered alongside other “Bologna” elements such as the European Qualifications Framework, ECTS and Diploma Supplement. Applying the ESG outside the EHEA, however, requires to detach them from their European context. In practice this has not been a problem in any of the accreditation procedures carried out by AQAS in the past. The reason for this is that the ESG are less supervisory in their function as rather advisory. The value of professional advice from external peers is one of the key benefits and assets of the ESG. They allow experts to focus on quality enhancement not only by completing a checklist but rather by formulating recommendations and providing guidance based on an intense study of the self-evaluation report and talks with different stakeholders on site. Should a standard be disrespected, they allow for the remedy of a possible shortcoming by imposing conditions and by binding the accreditation on the fulfillment of these conditions (see above).

The standard on quality assurance, for example, approaches the issue in very general terms; it is outlined that HEIs have a policy structure which is implemented by appropriate structures. Regulations on how the policy should be formulated are not given. HEIs may thus define their internal processes which best serve the characteristics, structure and context of their institution. As mentioned above, the aims of the HEI serve as the guiding principle for the assessment of procedures. HEIs, however, have to prove that the policies are implemented, published and used.

The ESG always have to be applied against the background of national criteria and regulations – in and outside the EHEA. Even though the ESG have been formulated broadly in order to allow for diversity, they may nevertheless collide with national regulations. This poses an issue for any ESG-based accreditation. Higher education systems differ in their degree of centralized regulation which imposes structures on universities and procedures which lie outside the rights of HEI to change them. It is certainly not the intention of the ESG to refuse an accreditation on issues which may not be adjusted by the university. The individual university should not be held accountable for national regulations.

One example how to address the situation if European practices are not in place in countries outside Europa is the European credit transfer system (ECTS). The issue of applying ECTS is a crucial one as it touches upon core ideas and values of the EHEA, namely the focus on learning outcomes and the increase in comparability to foster mobility. The ESG provide a soft formulation that ECTS may be used as one way of defining the workload. More important, however, is the fact itself that the workload in study programmes is defined based on learning outcomes rather than strictly on the actual hours spent in the classroom. This approach is an important tool to foster student centred teaching and learning, one of the standards defined in the ESG. In many countries outside Europe the system to calculate the workload for the different programmes differs from that in Europe. This was, for example, the case at the University of Ghana which has implemented its own credit system based on the national regulations. The panel of experts did not urge the university to change its system but rather recommended to develop a kind of table to calculate credits in a way that allows students to move between both systems, the Ghanaian and the European one.

A further example is the Diploma Supplement, which has been implemented by the Bologna participating countries to foster transparency and comparability of qualifications. Because the ESG require a “documentation explaining the qualification gained”, regardless of the format, the panel of experts at the University of Ghana requested to ensure that any kind of transparent, coherent and complete documentation is available for students and provided via an institutionalized procedure as it constitutes a tool favorable for students and universities. This allows the university to follow the aims of the ESG without the need to copy what is done at European universities.

## 5. STANDARDS AND GUIDELINES: EXPERIENCES MADE BY HEIS

When it comes to assessing study programmes against the 10 standards of the ESG, AQAS has made experiences that may form typical patterns and that may thus be aspects which should receive additional attention in future procedures. Outlining these could make experts, HEIs and agencies aware of possible hurdles in procedures.

Several of the standards of the ESG relate to the issue of *transparency*, be it the definition and outline of a programme and its learning outcomes or procedures and regulations governing formal study aspects (e. g. Standards 1.1, 1.2, 1.4, 1.8). It is one of the key underlying principles within the ESG. The concept of transparency and its benefit to students and universities is, however, considered differently in higher education systems. The standards for the definition of qualification aims and intended learning outcomes, for example, are often met within a programme while their transparent and formal formulation is lacking or only partially given. Requests for a more transparent documentation have thus often been voiced within ESG-based accreditation procedures.

A further finding regards the standard on the policy of quality assurance of a HEI. The ESG explicitly include all stakeholders involved in learning and teaching to contribute to quality improvement. Furthermore, their participation should be implemented in formal structures and procedures. The involvement of students on such a formal level is an approach which has been adopted only recently in some higher education systems while in others it is completely new. HEIs are thus met with a condition of including students more prominently in their internal procedures.

Applying the European Standards and Guidelines is often easier to be accepted by HEIs if the benefit is clearly outlined, as AQAS has experienced. Explanations of standards and the core idea which stands behind the introduction of these standards are often helpful. The extra effort in contextualization is, however, beneficial not only for the success of the accreditation procedure but also for the further development of a programme.

## 6. STANDARDS AND GUIDELINES: EXPERIENCES MADE BY EXPERTS AND AGENCIES

Just as the implementation of the ESG at HEIs may lead to detectable patterns, their application by experts and agencies just as well evokes recurrent issues, which can be addressed to enhance future procedures. The generic definition of standards, as mentioned at various times, certainly implies advantages. However, the broad formulation of criteria may create gaps in the assessment. From the point of view of AQAS, this refers especially to the issues of curriculum design and employability/labour market orientation.

When HEIs apply for an additional and international accreditation, they often aim specifically for an assessment and further development of their academic offer, i. e. the design and content of the programme. As mentioned in the introduction, the motivation for an international accreditation recurringly stems from the wish to further develop the programme and use the external review as a quality improvement tool. Effectively, however, the ESG remain relatively vague in the guidelines concerning the programme itself. Stemming from the German experience, AQAS has included some additional indicators on this issue which do not prescribe how programmes have to be designed but ask, e. g., for more detailed information on the structure and content of the programme.

Furthermore, more precise information or a clearer outline of a standard to be met would also be useful for the issue of employability in and of study programmes. This issue is typically very often addressed in international procedures and the success of graduates in finding adequate employment in the field is often pressing for HEIs. The ESG, however, barely refer to this issue; an indirect reference is provided in the design of programmes which should be outlined by involving stakeholders, i. e. the labour market as well. AQAS includes talks with labour market representatives on a regular basis in

international accreditation procedures. This provides the experts with a better assessment of the labour market and the professional field which students shall be trained for. However, the degree of employability or the implementation of this aspect is not outlined in the ESG and leaves experts with little reference for assessing in how far transferred knowledge and skills adequately prepare students for a professional career.

## **7. CONCLUSION**

So far, AQAS has carried out accreditation procedures based on the ESG in European, Asian, South American and African countries. No matter in which region experts assessed programmes, AQAS has always experienced that the ESG overall work very well in international accreditation procedures. They constitute an efficient and valuable tool to assess quality against a variety of higher education backgrounds. HEIs with which AQAS has worked have continuously articulated the benefit of the ESG-based accreditation and of an assessment carried out by an international team of experts. From AQAS' perspective there are no regional differences where to apply the ESG because they work well in all higher education systems.

Communication by all sides is certainly of key significance of a successful international accreditation procedure. Effort put into explaining procedural and/or cultural aspects for a better understanding between all sides has been proven worthwhile.

A reflection on the application of the ESG outside the EHEA leads to some conclusions with regard to the ESG itself and their use by HEIs and experts as well as with regard to the accreditation agency.

The acceptance and the success of the ESG within the EHEA rely to a considerable extent on their status as quality assurance guidelines agreed upon by all participating countries and their commitment to enhancing transparency, comparability and accountability in teaching and learning. Outside the EHEA, the acceptance and success often has to rely on the effectiveness of the ESG as a constructive tool for quality enhancement. As AQAS may conclude, the effectiveness has been proven; the increasing number of international procedures outside the EHEA may be considered as an indicator of this.

However, the generic formulation of guidelines may lead to uncertainties and gaps in the evaluation. More readable standards and guidelines for the design of programmes, for example, would provide HEIs and experts alike with a better working tool in fully assessing the academic quality of a programme.

The ESG, in conclusion, provide a valuable tool to further enhance the quality of programmes. On receiving the accreditation certificates, the director of WACCI, Professor Eric Y. Danquah, emphasized that the ESG have helped and will surely help to take the institution to a "higher level".

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