

1 Accreditation in the Framework of Evaluation Activities: A Comparative Study in the European Higher Education Area

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1.1 Introduction: The Study's Goals and Structure

Higher education systems in Europe are currently undergoing deep reforms. These reforms are triggered by national developments, as well as by the aim to evolve towards comparable systems and ensure the quality of the higher education systems in Europe (Bologna Process). This study was initiated by the education trade unions' goal to widen the scope of the debate on accreditation and evaluation activities in higher education in Europe from a comparative perspective. In order to provide the factual base for this discussion, we were asked to carry out a comparative study of 'accreditation in the framework of evaluation activities' in the European higher education area. Accreditation is the focus of our study, but accreditation is a policy instrument made up of two elements: evaluation and approval. Therefore, we felt it necessary to analyse these two elements in their own right. Hence, the aims of the study are to:

1. Provide an updated picture of the current situation with regard to (1) accreditation schemes, (2) other approval schemes (outside accreditation) and (3) evaluation schemes.
2. Analyse the underlying principles of the accreditation scheme(s) and how they relate to other approval and evaluation schemes ('system logic' or 'system dynamic').
3. Point out and analyse current reforms of the accreditation scheme(s) (with a view to other approval and evaluation schemes as well as supra-national developments, e.g. the Bologna process and other influences).

Our study covers all countries involved in the Bologna process. For practical reasons, we have had to limit ourselves to a sub-set consisting of all fifteen EU member states (situation as of 2003, minus Luxembourg which has a minute higher education sector), a main Western European country which is not part of the EU (Norway) and a sample of Central and Eastern European countries which entered the EU in 2004 (the Czech Republic, Hungary, Latvia, Lithuania, Poland), bringing the total to 20 countries. With regard to Central and Eastern Europe, we have reason to believe that the situation depicted below is representative of not just the countries sampled, but

also of much more of the Central and Eastern European area (Campbell & Rozsnyai, 2002).

We asked all 20 country experts of this study to provide reports on their respective system of ‘accreditation in the framework of evaluation activities’. They compiled studies describing and analysing in detail how the respective accreditation and evaluation systems are institutionalised and how they are linked to other relevant developments, e.g. the Bologna Process and internationalisation trends (including GATS). From April 10 to 13, 2003, all country experts were invited to share their work and to learn about the ideas of their European colleagues in a two-day workshop at the EI/GEW Forum ‘Shaping the European Area of Higher Education and Research’.

In this chapter, we will provide a synopsis of the findings of the country reports by taking the three main elements, ‘accreditation’, ‘evaluation’ and ‘approval other than accreditation’ as the basic structure of the sections. To maintain consistent distinctions between accreditation, evaluation and other approval schemes across all 20 country cases, we adopted the following definitions.

*Accreditation schemes*¹: All institutionalised and systematically implemented evaluation schemes of higher education institutions,² degree types³ and programmes⁴ that end in a formal summary judgement that leads to formal approval processes regarding the respective institution, degree type and/or programme.

Approval of institutions, degree types, programmes: To grant the ‘right to exist within the system’ (or, respectively, to reject the ‘right to exist’) to an institution, degree-type, programme (e.g. charter, licence, accreditation). The approval can be carried out by several organisations or one organisation and is granted by one or more organisation(s) at the supra-institutional level.

Approval outside the accreditation scheme: All major approval schemes of higher education institutions, degree types and programmes that are not part of the accredi-

1 The term ‘scheme’ refers to the ‘entire picture’, the ‘overall picture’, the landscape of the respective three concepts of ‘accreditation activities’, ‘approval other than accreditation activities’ and ‘evaluation activities’.

2 *Higher education institutions*: All organisations providing degrees at the tertiary level (ISCED 5 and 6), recognised by governmental/public agencies and/or by the general public. This definition is meant to include both public and private higher education institutions with official national recognition and ‘non-official’ higher education leading to degrees that may be recognised in other countries but not necessarily in the country of operation. Our intention is to keep an eye open on organisations that are active in ‘transnational higher education’.

3 *Higher education degree-types*: The different degrees that are awarded by and certified through a higher education institution (e.g. Bachelor, Master, Diploma, etc.).

4 *Higher education programmes*: All education provisions within higher education institutions that lead to higher education degrees (ISCED 5 and 6).

tation scheme (e.g. approval by the state ministry that does not involve accreditation).

Evaluation schemes: All institutionalised and systematically implemented activities regarding the measurement, analysis and/or development of quality for institutions, degrees-types and/or programmes that are carried out at the *supra-institutional level*. Evaluation activities *do not* directly or indirectly lead to approval processes regarding the respective institution, degree type and programme.

Other evaluation schemes (than the just mentioned): Other types of ratings / measurements of quality that do not fulfil the criteria of the definition of *evaluation schemes*, such as institution-based evaluation.

Moreover, the term *quality assurance scheme* or *quality assurance system* will be used as an umbrella term, denoting accreditation and evaluation systems together, in contrast to approval without formal evaluative elements.

These definitions were developed with a view to the specific goals of our study and may therefore diverge somewhat from other sets of definitions. However, we are convinced that the differences with many recent or authoritative publications in the field are not substantial (cf. Sursock, 2001; Young et al., 1983). A particularly well-developed set of definitions is found in an ENQA report on ‘accreditation-like practices’ (Hämäläinen et al., 2001). Hämäläinen et al. also distinguish distinction between *accreditation* and *approval* ‘(without an explicit accreditation process)’ (p. 7), but they also analyse terms that cover effects for the individual graduate, such as *recognition* of degrees and *authorisation* to practise a given profession, which are beyond the scope of this study. When discussing accreditation, they make several distinctions, i.a. official as against private accreditation. In their terms, our definition of accreditation seems targeted at ‘official’ accreditation, i.e. accreditation by governmental higher education authorities or their delegated agencies, leading to – as in our definition – formal approval decisions. ‘Private accreditation’, being voluntary and not linked to the authorities, ‘may enhance a unit’s reputation, but it does not alter its formal status’ (Hämäläinen et al., 2001, p. 9). As will be shown below, in ‘open accreditation systems’ such private accreditation agencies may be given a role in the authorities’ decisions, which is one of the reasons why we include them in our study. Moreover, with the current ‘denationalisation’ (cf. i.a. van Vught, van der Wende, & Westerheijden, 2002) of higher education we do not wish to overlook the possibility that higher education institutions attach a great deal of importance to private accreditation by narrowing our definition too much in advance.

Our study has limitations, of course. To begin with, it is limited in time: editing of the country chapters was closed in summer/fall of 2003. Hence, for newer developments the reader is referred elsewhere. Like all studies based on the voluntary cooperation of a large number of experts from very different national backgrounds, it

has its limitations regarding coherent use of terms. The definitions we gave above were communicated to the authors of the country reports, and we took measures to try to ensure that they were applied in a uniform fashion. Yet some room for interpretation of the meaning of the terms remained, and more room for interpretation had to be left to the authors in linking the terms to empirical phenomena in their countries. In that sense, this study reflects some of the diversity that is often seen as both a strength and a weakness of Europe.

Another limitation lies in the aim and scope of this chapter. The wealth of information given in the 20 country chapters is more than can be analysed in any single chapter. For instance, we focused on commonalities rather than differences in order to emphasise the common ground that already exists in the area of evaluation, accreditation and approval and that can be used as a basis for further development towards a European Higher Education Area. We are aware that there are differences among the countries and that underlying principles embodied in national institutions may make the commonalities less common than they may seem at first sight. Still, we aim to show that the common approach of cross-national studies of higher education systems in Europe, in which the historical differences are often emphasised, need not be the only viable approach. Path-dependencies do not preclude convergence, especially not in a geographical area where so much interdependence has existed for so many centuries.

A final limitation that we should like to mention is the fact that time and budget could only be stretched so far. In a fast-moving area – and higher education in Europe in the wake of the Bologna Declaration certainly is a fast-moving area – perhaps it is better to have a book like this one with a relatively up-to-date picture of the evaluation and accreditation landscape, rather than a more thorough analysis that comes well after the events.

1.2 Quality in the Steering of Higher Education Before the Bologna Declaration

Quality in the sense of achieving academic excellence has always been a central value in higher education. Neave rightly stated ‘quality is not “here to stay”, if only for the self-evident reason that across the centuries of the university’s existence in Europe, it never departed’ (Neave, 1994, p. 116). Until the 1970s, quality in higher education was controlled through bureaucratic means: legal conditions for the establishment of institutions, faculties and/or programmes of study and state-provided means (funding, housing) to fulfil those conditions, centralised and formalised rules for the appointment of academic staff, similarly centralised and formalised rules for

the acceptance of students, annual line-item budgets, etc.⁵ And until about the 1960s or 1970s, this way of ensuring quality of higher education was fairly successful: low-quality provision of higher education was an unheard of phenomenon in the state-controlled European higher education systems. However, quality assurance as a separate instrument in university management and in government policy started in the 1970s and 1980s, when it was discovered as a new management tool in industry mimicking the successes of the Japanese economy. First, higher education in the USA was influenced, later, around 1984, the first governmental policies were implemented in Western Europe. Apart from the old isomorphism drive to copy whatever seemed successful in US higher education, and the new isomorphism drive to copy whatever seemed successful in industry,⁶ there were a number of reasons why new governance tools became expedient in Western European higher education at that point in time. In sum, these were (van Vught, 1994):

- ‘massification’ of higher education;
- limits of central control were reached with these larger higher education systems;
- deregulation was in fashion at the time, when neo-liberalism made a forceful entry into the political arena;
- government budget limits were reached, again because of the massification of higher education but also more generally because governments under the neo-liberal influence were not willing to increase the share of public to private earnings even more to maintain the welfare state.

This put ‘value for money’ high on the agenda, which resulted in higher education institutions being given autonomy to do ‘more with less’, as one of the half-serious, half-sarcastic slogans went. As Trow observed quite sharply, evaluation policies indicated the breakdown of the traditional degree of trust in society that higher education was functioning at high quality (Trow, 1994, 1996). A danger inherent in evaluation policies is that ‘[i]f accountability and evaluation are reduced to a primarily technical exercise by way of rigid output measures and overly standardised evaluation exercises, then the essential debate about the values and assets which HEIs are best suited to pursue for society is clearly at risk’ (Reichert & Tauch, 2003, p. 102). This rise of societal demands for accountability has been documented exten-

5 The United Kingdom and Ireland have been exceptions in this trend of bureaucratic centralised control on the European continent. British universities were more autonomous, but they too were subject to national rules (e.g. Acts of Parliament) for their establishment and there was national funding (although the British mechanism for distributing money, the University Grants Council, gave much more autonomy to the academic oligarchy) (Clark, 1983).

6 We stress ‘seems’ here, because of the mimetic character of much of this copying behaviour, witnessed by the fact that many similar ‘fads’ fade away without leaving many traces after a number of years (Birnbaum, 2000).

sively, not only in higher education, but also and especially in public administration (cf. Brignall & Modell, 2000; Enders, 2002; Lane, 2000; Rowley, 1996).

The implementation of quality assurance mechanisms in higher education systems first started in some Western European countries in the middle of the 1980s. In Central and Eastern Europe, they were introduced from 1990 onwards. However, the aims and goals attached to quality assurance were quite different in Western and Central/Eastern Europe at the outset.

The 'pioneer countries' in Western Europe – the United Kingdom, France and the Netherlands – introduced their first formal quality assurance policies around 1985. In 1990, Denmark was the first follower of these pioneers, and from then on, the 'quality movement' spread to the rest of Western Europe. The conditions of higher education in Western Europe were similar for some countries and quite different for others, as were the tendencies to mimic. For example, the main motor to establish accreditation in most Nordic countries was the desire to expand open access and equal opportunity for mass higher education by creating new regional colleges and new study programmes as counterparts to the large traditional universities. In other countries both North and South (Germany, Italy, the Netherlands), low efficiency of the higher education system was the major issue to be solved by quality assurance.

An important tool in spreading the external evaluation was the European Union's Pilot Project, which was launched in 1994 (Management Group, 1995). It consisted of evaluation exercises involving one or two programmes in two knowledge areas in all (then) EU countries.

In 1998, as a late consequence of the EU's pilot project, the Commission of the EU made a recommendation to establish and support a network of the EU member states' quality assurance agencies (Kern, 1998). This network, the European Network of Quality Assessment Agencies (ENQA), became operational in 2000. By 2002, it had 36 member organisations and 30 government members. With a voluntary but exclusive membership, ENQA is heterogeneous in nature. The character of its operation is professional – a body of quality assurance experts – rather than political, although its work inevitably has political consequences. ENQA is very aware of this.

That same year, just before the Sorbonne and Bologna Declarations changed the whole scene, two inventories were made of the situation of quality assurance in Western Europe (Centre for Quality Assurance and Evaluation of Higher Education, 1998; Scheele, Maassen, & Westerheijden, 1998). From both, it can be concluded that almost all Western European countries at that moment had a government policy to assess quality in higher education. (The most notable exceptions were Germany, Italy and Greece.) Spontaneous serious involvement of universities in quality assurance without governmental policies were rare exceptions, although existent (witness

e.g. the dozens of universities that volunteered for the CRE's Institutional Evaluation Programme). And if universities engaged in quality assurance voluntarily, the effectiveness tended to be much more marked than when complying with government-initiated policies (Brennan & Shah, 2000).

The Central and Eastern European countries advanced rapidly regarding evaluation and accreditation activities. With the demise of the Communist regimes in Central and Eastern Europe in 1989–1990, the issue of quality assurance presented itself in a very different form in this half of the continent, quickly leading to different institutional arrangements to cope with it. Before 1989, the central control of quality in Central and Eastern Europe, like in the West until the 1980s, was based on bureaucratic means. In Šebková's words in this volume: 'Quality was not evaluated or even discussed. Indeed, the high quality of education was simply declared and announced'. In (some degree of) contrast to the West, state bureaucratic control was confounded with overt and covert control mechanisms of the governing party's *nomenklatura* system (e.g. Cerych, 1993; Hendrichová, 1998; Neacsu, 1998; Sadlak, 1995; Wnuk-Lipinska, 1998).

In short, we could say that the main purposes of introducing quality assurance policies in Central and Eastern Europe included (cf. Westerheijden & Sorensen, 1999):

- Transformation of higher education curricula to eradicate Marxist-Leninist dogma.
- Rapid expansion to accommodate tremendous excess-demand for higher education (reflecting the needs of post-industrial societies in combination with the elite character of the higher education systems).
- Much freer entry to the higher education market than previously, for national private higher education institutions as well as for foreign (public and private) higher education institutions.
- Underlying these changes was the change of the relationship between the state and higher education institutions: the state retreated from its former strict central control, which led to extremely decentralised higher education systems.

In general, the model used for quality assurance in Central and Eastern European countries was that of state-controlled accreditation of all programmes and/or institutions in the country. Accreditation was to function as a shield to keep out 'rogue' provision of higher education and maintain some form of central control in the highly decentralised higher education systems.

In sum, this shows a great divide among the different paths of development with regard to quality assurance followed in European countries. In the next section, we will look in more detail at the situation in the 20 countries of our study. For analytical purposes, we will try to group countries as much as possible, but the groupings and categories may be different for different aspects, implying that in principle there

is not a *fixed* taxonomy, as summarised in geographical notions like ‘the Nordic countries’, ‘the Mediterranean countries’ or the ‘Central and Eastern European countries’ – even though for some limited purposes such fixed geographical categories may be useful.

1.3 Quality in the Light of Evaluation and Accreditation Activities

The countries in this study include many of those that signed the Bologna Declaration – that is why they were chosen in the first place. It was only for reasons of time and money that we could not include all of them. At the same time, we are spanning large parts of other continua. For instance, the size of the higher education systems in the countries involved ranges from small (with some 110,000 students in Latvia) to large (e.g. France, which counts more than 2 million students in higher education). There are also unitary systems (e.g. the United Kingdom) and systems with several types of higher education institutions (e.g. France). All are to a large degree publicly funded, although the institutional arrangements differ; e.g., in the United Kingdom all public institutions are autonomous entities, while in Germany they are in many respects (e.g. personnel policy) part of the government apparatus. The arrangements regarding private higher education also vary: from non-acceptance (as in the Czech Republic before 1998) to liberal – but quality-controlled – as in the Netherlands.

When in the following we refer to ‘government’, in many countries this is the nation-state government. However, a number of large European countries have devolved (part of) authority over higher education to federal states within the nation, especially Germany, Spain, the United Kingdom. Belgium has another type of federalisation. Here, higher education is completely decentralised and our data (as often in European projects) are limited to the Flemish-speaking Community.

Concerning government, there is great fluidity regarding its role, ranging from passive administrative authorisation for a private body to open a higher education institution, to actively taking the initiative to create and support a public body to run a higher education institution. In this chapter we are mainly concerned with the passive side of the spectrum, i.e. with the judgement and approval, not with the issue of whether governments also actively initiate and support higher education institutions or study programmes.

In response to the GATS negotiations, both universities and students in Europe in 2000 vehemently declared that higher education in Europe was a public good (EUA & ESIB, 2002), a statement also adopted by the ministers of education (*Prague Communiqué*, 2001). And indeed, higher education in all the countries involved in

the study is mainly provided by public institutions.⁷ However, private higher education institutions can be found in most countries (except Greece), even though they usually service only a small proportion of the students according to official statistics (Tsaoussis, 1999; Uvalic-Tumbic, 2002). Thus, in Germany there are 43 private higher education institutions servicing just over 1 % of all students. In other countries, private higher education is much more widespread (e.g. Poland, Portugal).

1.3.1 The Three Pillars in Relation to Each Other: Evaluation, Accreditation and Approval

Quantitative Developments of Evaluation and Accreditation Activities in Europe

As indicated in section 2 of this chapter, European countries have experienced great change regarding their institutionalisation of evaluation, accreditation and ‘approval other than accreditation’. The results of our study show that in the early 1990s, less than half of the European countries had started evaluation at the supra-institutional level. By 2003, all European countries had implemented supra-institutional evaluation, except for Greece (see Tables 1 and 2). According to data in the *Trends III* report, this covers 80 % of all higher education institutions in Europe (Reichert & Tauch, 2003, p. 105).

Table 1. Focus on supra-institutional evaluation activities. Year: 1992⁸

No focus on evaluation activities	Focus on evaluation activities
NO, SE, FI, ES, PT, IT, GR, DE, AT, BE(FL)	NL, DK, FR, GB, IR, HU, PL, CZ, LT, LV

Table 2. Focus on supra-institutional evaluation activities. Year: 2003

No focus on evaluation activities	Focus on evaluation activities
–	NO, SE, FI, DK, HU, PL, CZ, LT, LV, ES, PT, IT, GR(?), GB, IR, DE, AT, FR, BE(FL), NL

In most countries, evaluation activities include teaching as well as research performance (in combined or separate schemes) and may be carried out at the programme as well as at the institutional levels (cf. also: Danish Evaluation Institute, 2003). Great

⁷ In the United Kingdom: ‘state-funded private institutions’.

⁸ For brevity’s sake, we shall use ISO two-letter codes to designate countries in the tables; Flanders will be abbreviated to BE(FL).

differences are encountered when the focus is on aims and instruments of evaluation. The 2003 ENQA survey sees three predominant modes: programme evaluation, programme accreditation and institutional audit (Danish Evaluation Institute, 2003). However, the general procedures of supra-institutional evaluation in all countries largely follow the ‘general model of quality assessment’ (van Vught & Westerheijden, 1994).

Granting institutions and programmes ‘the right to exist’ was traditionally a task that was performed by the state government. Only recently, in the wake of the introduction of ‘new autonomy’ for higher education institutions, has the task been transferred from the state ministries to newly established supra-institutional organisations (e.g. accreditation agencies, quality assurance agencies that incorporate accreditation activities, etc.). The country experts report that all European countries have established a framework of accreditation for (parts of) higher education. The pace of the development can be characterised as rapid. Whereas in 1998 less than half the European countries in our study had implemented accreditation schemes for (parts of) higher education, in 2003 all European countries, with the exception of Greece⁹ and Denmark¹⁰, defined their system as having implemented ‘some type of accreditation scheme’ (see Tables 3 and 4).

Table 3. State approval versus accreditation scheme with evaluation activities. Year: 1998

State approval	Accreditation scheme with evaluation activities
NO, SE, FI, DK, ES, PT, IT, GR, DE, AT, FR, BE(FL), NL, LT	HU, PL, CZ, LV, GB, IR

Table 4. State approval versus accreditation scheme with evaluation activities. Year: 2003

State approval	Accreditation scheme with evaluation activities
DK, GR(?)	NO, SE, FI, HU, PL, CZ, LT, LV, ES, PT, IT, GB, IR, DE, AT, FR, BE(FL), NL

Denmark is the only country in Europe that explicitly does not see any added value in shifting from its well-functioning evaluation scheme in combination with state approval to an accreditation scheme in combination with evaluation activities.

⁹ At the time of writing the reports in this volume, evaluation was proposed in Greece, but the policy process had not come to a conclusion. Accreditation was a concept beyond the Greek discussion.

¹⁰ Nevertheless, even in Denmark accreditation is part of the policy instruments, viz. for private tertiary study programmes that want to apply for government funding. However, this is an ‘accreditation’ performed solely by staff of the national evaluation agency (cf. the remarks on France below).

Whereas evaluation activities follow a common general approach in all European countries, accreditation is not following any type of common general approach at present in Europe. The main differences in the accreditation schemes across Europe can be defined as follows:

- (1) There are currently no patterns that demonstrate comparable structures of accreditation schemes. For example, the accreditation activities range from approval procedures of 'degree programmes at one type of higher education institution' (e.g. Austria) to 'all institutions and all programmes' (e.g. Hungary). The key players are quite different in the European countries, some countries have started agencies at the supra-institutional level (e.g. Germany, Spain), others have accreditation only for professional fields by professional bodies (e.g. Ireland, Spain before 2003), other countries regard the state ministry as the 'accreditation agency' in co-operation with the respective quality assurance agencies (e.g. Finland).
- (2) At present, there are no patterns that demonstrate comparable methods for accreditation schemes. Moreover, a number of country reports suggest that there is no direct link between the different types of accreditation organisations connected to public authorities (e.g. accreditation agencies), and private sector agencies (e.g. professional bodies) (e.g. Spain, Portugal, the United Kingdom).
- (3) The types of evaluation processes underlying the approval decision in accreditation schemes vary widely.

In sum, one can wonder if there is a common understanding of 'accreditation' amongst the contributors to the country reports – notwithstanding the definition given in this project – and more broadly, amongst the decision-makers in the European countries. We shall look into that issue in more detail later, but first, we shall continue our overview of the evaluation framework in the European countries.

Approval as an Indicator of Trust or of Lack of Autonomy?

The rise of quality assurance with evaluation and accreditation activities as a policy instrument has been interpreted as indicating a decrease in the trust in society that higher education 'delivers the goods' without giving special attention to it (Trow, 1996). Partly, an assurance of quality was implicit in the governmental regulation and funding of the overwhelmingly public systems of higher education in Continental Europe, as mentioned above. In that perspective, countries where traditional forms of approval without explicit evaluation are prevalent show a higher level of trust in higher education than countries where evaluation and accreditation are prevalent modes of control. However, the absence of formal evaluation or accreditation cannot really be taken as a sign of trust, for traditional bureaucracy was and is a powerful means of control in itself (cf. France, Greece). Indeed, the argument was often made that quality assurance was an alternative to the former strict bureaucratic

control, giving more room for institutional autonomy,¹¹ self-regulation or bottom-up initiatives in the higher education system (e.g. Flanders pre-2003, Finland, Greece, the Netherlands pre-2003, Sweden).

Specifying what ‘traditional’ bureaucracy controls and what ‘modern’ evaluation or accreditation controls, can solve the paradox. In general, bureaucratic control focuses on inputs (staff appointments, student access, annual funding, curriculum plans), although the French process of approval of private higher education institutions only takes place after five years of operation, implying that there is some degree of interest in output. Yet even here, the main emphasis is on staff qualifications, facilities and similar input factors. In contrast, evaluation and accreditation can focus on input, process or output alike. In more traditionally-oriented evaluation and accreditation systems, the focus remains on input factors. The aim of quality assurance models developed during the 1980s and 1990s in industry, such as TQM and ISO-9000, was to draw attention to the process of ‘producing’ quality education and quality graduates – the latter was the funnel through which output quality came into the picture. The French case also shows the fluidity of terms – notwithstanding our efforts to develop strictly separated definitions. What is called into question by the report on developments in France is the meaning of ‘evaluation’: Is it necessary for evaluation to be built upon the four-step model (van Vught & Westerheijden, 1994) with self-evaluation and review panels performing site visits? Or is it enough for experts from the ministry of education to study documentation sent by a higher education institution?¹² How does the latter differ, if at all, from the rules-based and paper-based traditional bureaucratic preparation of a decision? The distinction between accreditation and evaluation is also fluid in France. As Chevaillier mentions, (internal) evaluation is a condition for accreditation (or approval) of a study programme. Still, he makes clear that without changing names of official procedures, the mechanisms through which these procedures *actually* operate, and the character *in operation* (in caricature: from a bureaucratic rubber stamp to an actual evaluation with no guaranteed outcome) may change considerably.

Accountability and Improvement Orientations

A main distinction in the analysis of quality assurance is the types of functions a system must fulfil. Weusthof & Frederiks made a distinction between four main functions (Weusthof & Frederiks, 1997):

11 Institutional autonomy is not the same as individual academic freedom, although in political discourse, they seem to be mingled where the main opposition is between government and higher education. The moment the discussion turns into questions of power within the higher education institution, the opposition between academic freedom and institutional autonomy becomes clear, the latter being easily equated with ‘managerialism’.

12 Also the practice in some British professional organisations.

- Accountability,
- Quality improvement,
- Validation,
- Information.

It may be argued that the basic divide – inextricably linked like ‘two sides of a coin’ (Vroeijenstijn, 1989) – is between accountability and quality improvement. Accountability has to do with informing society (in particular the state) about the quality ‘delivered’ by higher education. Validation (the function of legitimising quality judgements, i.e. something accreditation is supposed to do) can be seen as a form of accountability. Therefore, in the countries with a heavy emphasis on accreditation, it may be argued that there is also an emphasis on the accountability side of the coin. Information as Weusthof & Frederiks used it is linked to the transparency issue which, at the international level, is one of the main reasons for the Bologna process; it is information for stakeholders to help them make reasoned choices (e.g. for pursuing studies, or for employing a graduate). The information function was stressed in Sweden. Quality assurance stressing accountability or information giving in itself is not a strong incentive to improve or enhance quality of higher education above the threshold level defined by e.g. accreditation standards or governmental requirements. This was shown amongst others in the research on the effects of the Dutch external quality assessment mechanism (Jeliazkova, 2001; Jeliazkova & Westerheijden, 2000). A strong drive for quality improvement therefore may need external mechanisms tuned to fulfilling this function. While agreeing that the situation is indeed like ‘two sides of a coin’, and more complex than a simple dichotomy would suggest, as a first approximation we should like to typify countries in the study on this dimension (Table 5). Other countries’ landscape of evaluation and accreditation is so mixed that even a rough sketch seems too risky (the Czech Republic may be a good example, with both accountability-oriented accreditation and improvement-oriented evaluation).

Table 5. Broad emphasis of accreditation and evaluation systems per country: Year 2003

Accountability emphasis	Quality improvement emphasis
BE(FL), DE, HU, PT, LT, LV, NL	NO, SE, FI, DK

As a rule, quality assurance agencies, governments and higher education institutions tend to emphasise the quality improvement element. Most studies therefore find that quality improvement is the most common function of evaluation and accreditation schemes (Campbell & Rozsnyai, 2002; Danish Evaluation Institute, 2003; Reichert & Tauch, 2003). From our reading of the country reports in this volume, a different

picture emerges if one tries to distil the primary focus of the schemes as they are actually implemented (Table 5, selected countries, as explained above).

An element of the validation function may also be the recognition of study programmes abroad for purposes of student mobility or for graduate employment abroad. Although until now this is mostly dealt with by means of individual level arrangements through degree recognition by higher education institutions on the advice of ENIC/NARIC offices, quality assurance is given prominence in this respect as well (Sweden). In some cases, better international recognition of the country's higher education degrees was an explicit argument to introduce accreditation (the Netherlands). This international or European dimension seems to be prevalent mostly in small countries.

Unanticipated consequences of introducing supra-institutional evaluation or accreditation schemes may include a tendency for rigidity, as attention in higher education institutions may focus on meeting (perceived) standards (hence the term 'compliance culture'; van Vught, 1989) rather than on accountability to society (also *Trends III* report, cited before). However, higher education institutions often value external evaluation and accreditation activities as a positive 'prodding' to pay attention to its important but not always urgent core value of quality education.

Another potential problem of the development of national frameworks for judging study programmes may be that they put pressure on harmonisation within countries at a time when it is claimed that diversity is needed more than ever:

- because of 'massification' of higher education (countries are setting ever higher participation targets, sometimes well above 50 % of the relevant age cohort), different types of students have different learning needs;
- in the 'knowledge society', the roles of higher education are multiplying, leading to the need to respond in different ways to different demands.

Pressure to uniformitise may ensue from methodical issues associated with the pre-defined criteria necessary in accreditation. They would lead to greater homogeneity instead of the diversity of approaches and competencies needed in the present-day 'massified' higher education systems and in the emerging knowledge economy. Besides, adaptation of published criteria is a time-consuming process, so that accreditation continuously runs the risk of falling behind the state of the art. Then again, accreditation criteria tend to be a compromise between the participants in the decision-making process of the accreditation organisation, leading to the criteria being a *communis opinio*, but not challenging for the development of the best programmes or units. Finally, as accreditation judgements are based on passing threshold criteria, they would tend to discourage innovation and quality improvement. Innovative approaches to accreditation criteria and processes can overcome such disadvantages at least partly, as seen, for example, in the current practices in

European EQUIS (www.efmd.be), in the American engineering accreditor ABET (www.abet.org/eac/eac2000.htm) and other professional accreditation organisations in the USA, as well as in the US regional accreditor WASC (www.wascweb.org).

Relations between Accreditation, Evaluation and Approval Schemes

Quite often, the picture depicted for foreign observers of steering quality in a country's higher education system seems to be that there is only one scheme. The country reports in this study clearly show that – as any student of the matter discovers upon closer contact with any single higher education system – the situation is never as simple as that. Even separating steering of quality from other instruments of higher education policy, as this study does, entails some distortion of the full picture. We try to overcome this limitation in two ways. One is to focus on the dynamics or driving forces. The other is to look at all (main) different supra-institutional schemes, focusing on their interaction.

For the mainly publicly-funded higher education systems that are the norm all over Europe, governmental recognition of study programmes or higher education institutions is the main decision that can be reached, as it comes with official recognition of degrees (often an important if not always necessary condition for degrees' *effectus civilis*) and with funding for the programme or institution as well as for students (i.e. student stipends, grants, loans, etc.). Governments almost invariably use a single scheme as the authoritative basis for (semi-)official recognition or approval of study programmes and/or higher education institutions. This is most explicit with governmental approval schemes and with 'state-sponsored' accreditation schemes (e.g. Flanders, the Czech Republic, Germany, France, Hungary, the Netherlands, Poland), but can be equally the case with evaluation schemes (Denmark, Sweden, the United Kingdom).

Other evaluation or accreditation schemes, in particular those under the control of the professions (as in Portugal and the United Kingdom), are important for students, as they influence their chances of entering the labour market, but are less clearly linked to governmental decision-making. In the United Kingdom, the influence of professional accreditation in some cases is offset by the reputation of the university: degrees from prestigious universities will be sought after by students even if they are not accredited by the competent professional organisation. In Portugal, representatives of the professional *Orden* often take part in the review teams of the national evaluation as 'linking pins'.

Ownership of evaluation schemes by the higher education institutions (as in the United Kingdom, Portugal, the Netherlands pre-2003) seemed to result in less direct links with governmental decision-making than 'state-sponsored schemes', yet more direct than the cases where schemes are owned by professions.

Moreover, in what can only be analysed as their marketing efforts, higher education institutions are increasingly engaged in collecting multiple accreditations voluntarily. The areas of business schools (EQUIS, AMBA, AACSB are familiar 'kite marks' here) and faculties of engineering (turning mostly towards ABET or FEANI) provide prime examples across all European countries. Even in the very core of French higher education with its tradition of an 'économie concertée', signs of increasingly aggressive marketing are visible in the establishment of the *Conférence des Grandes Écoles*.

When several accreditation or evaluation schemes exist in a country, one question becomes how they interact with each other. Is there a concerted system of one scheme complementing another, or is interference a better characterisation? Often, a fear exists in higher education institutions that interference may cause a bureaucratic overload leading to 'evaluation fatigue' because independent agencies involved in different schemes always seem to want information in their own particular format. Indeed, it seems that careful co-ordination is needed to achieve beneficial complementarity among schemes. Putting several schemes under a single agency may be a way to achieve this, as is seen in the Czech Republic. Yet there is a danger that one of the schemes will come to dominate the scene and attract most effort and attention, undermining the idea of complementarity.

The parallel existence of national evaluation or accreditation schemes with those of professions and voluntary schemes is one of the reasons for the 'evaluation fatigue' noted in our reports. In Portugal, conversations have been initiated to achieve more efficiency in this respect. In the United Kingdom, the perception of an excessive evaluation burden has been one of the main reasons for the higher education institutions' 'revolt' against the former QAA evaluation scheme, which led to the introduction of 'a lighter touch' after 2001. In the Netherlands, the existence of at least four (semi-) official evaluation schemes led to a consolidation of the three main research reviews into a single research review scheme in 2003, alongside the accreditation scheme for education.

There are, in addition, other issues of complementarity or interference than just the information delivery issue. For instance, in the Netherlands, the accreditation scheme introduced in 2003 is meant to maintain the quality improvement function that was such a prominent feature of the previous evaluation schemes. The accreditation scheme is sometimes portrayed as an addition on top of evaluation, i.e. as if they are complementary. It is not clear, however, if the knowledge that an evaluation process will be used for accreditation purposes will not lead to strategic behaviour (e.g. trying to hide weaknesses from accreditors instead of discussing them with peers). If that happened, accreditation would be interfering with the evaluation scheme.

Parallel evaluation schemes also lead to the question of whether the striving for more transparency actually leads to less transparency for the 'end users', i.e. for students, parents and employers, in other words, whether Europe's previous 'jungle of degrees' will be replaced by a 'jungle of accreditations' (Haug, 1999).¹³ However, the fear of uncertainty is not the only way to look at the issue. The other side of the coin is the increased information given by different types of accreditation judgements in 'open accreditation systems' (van Vught et al., 2002). Study programmes or higher education institutions may distinguish themselves by choosing one or another type of accreditation, and in principle the 'end users' would then know more about the qualities of the institution than when only a single quality 'kite mark' were available. However, in the developing practice among business schools, which seem keen on accumulating as many accreditations as they can (in a different meaning of a 'multiple accreditation system') it becomes unclear what the marketing message to potential customers will be from sporting a whole set of accreditations – although these schools are best placed to know about marketing...

The International Scene: National Steering of Quality and Transnational Higher Education

Both globalisation and the Bologna process – insofar as the two can be separated – call the relevance of national borders into question to some degree. International mobility of students and graduates is one of the aims of the Bologna Declaration. In the analytical scheme of GATS, one of the 'modes of delivery' of transnational education is the 'commercial presence' of foreign higher education institutions in other countries. How do approval, accreditation and evaluation schemes accommodate the cross-border aspects of higher education?

Under the new Norwegian accreditation scheme, the co-ordinating agency NOKUT has been given the brief to develop a recognition policy, focusing on Norwegian students' obtaining degrees from foreign higher education institutions. This seems to be a case where the quality assurance agency is also given tasks of ENIC/NARIC agencies, where the recognition of foreign degrees on an individual basis is the core task. A difference with normal ENIC/NARIC agencies may be that, in Norwegian higher education regulation, stress is laid on developing general criteria rather than case-by-case decisions.¹⁴

A different view on international aspects is given by the Netherlands Accreditation Organisation, which resuscitates the Renaissance meaning of the 'nether lands' (low countries) in that it includes both the Netherlands and Flemish Belgium. In fact, this

13 The same could be said about evaluation schemes, not just about accreditation schemes, but that is what the discussion focuses on most often.

14 Possibly, the difference with ENIC/NARIC decision-making may not be great at all and it may just be a matter of emphasis in the regulatory texts.

is going to be a bi-national accreditation organisation, showing that national systems are no longer the only units to consider in the European higher education landscape. At the same time, this example shows the difficulty of working across state borders: the legal frameworks, although having the same intention, are not *quite* the same, and operationally the NAO is discovering that ‘the devil is in the details’.

Virtually all accreditation and evaluation schemes apply to higher education institutions within the country. In some cases it was mentioned that foreign providers of higher education also have to be accredited in order to operate (Hungary, the Netherlands since 2003). On the other hand, the United Kingdom is the only country requiring (and evaluating!) British higher education institutions to apply quality assurance principles for their provision overseas.

Transnational aspects of higher education are addressed explicitly in cross-national initiatives such as the Joint Quality Initiative of a number of European countries (www.jointquality.org) and the *Tuning* project. But this is not our subject of study (cf. Farrington, 2001; Machado dos Santos, 2000; Middlehurst, 2001; Reichert & Tauch, 2003; Westerheijden & Leegwater, 2003). In most national quality assurance schemes, on the contrary, international aspects are not clearly visible (such as regular use of truly international reviewers, application of explicitly ‘international’ standards and criteria, attention for internationalisation/Europeanisation of curricula, etc.).

1.3.2 Accreditation in More Detail

Coverage

As a rule, *all* higher education institutions and *all* programmes at *all* main levels of bachelor, master and (less often) doctorate in a higher education system are subjected equally to accreditation schemes. There may be differences by institutional category, e.g. only universities that offer master’s degrees can apply for accreditation to obtain the right to offer PhD degrees (or PhD programmes), as in the Czech Republic, Hungary, Poland. In Germany, accreditation is so far limited to the new two-cycle structure (Bachelor and Master), leaving aside the traditionally structured programmes (Magister, Diplom, etc.) Another exception to the rule of universal application is found in Austria, where the new sectors of colleges (*Fachhochschulen*) and private, postgraduate, higher education institutions are subject to accreditation, while the traditional public university sector until now is exempt from it. Similarly, in Ireland only the non-university higher education institutions are subject to direct external control of programme quality comparable to an accreditation scheme by HETAC.

It goes without saying that voluntary and professional accreditation schemes, such as business studies associations in several countries (e.g. the United Kingdom, Italy) or internationally (EQUIS), only cover units in their own field, and that, being voluntary, higher education institutions are free to take or not to take such an accreditation. For some regulated professions in some countries however, professional accreditation is practically obligatory in order to ensure graduates' access to the labour market (e.g. accountancy or engineering in the United Kingdom, engineering in Portugal).

In the majority of countries, the *study programme* is the 'unit of analysis' in accreditation schemes in Europe. That is to say that the main judgements resulting from accreditation schemes pertain to individual programmes of study (Table 6). However, the higher education institution as an organisational entity is the focus of accreditation if accreditation is used to confer a legal status on higher education institutions, e.g. as 'university college' or 'doctoral-granting university'.¹⁵

Table 6. Unit of judgement in accreditation schemes

Programme of study	Higher education institution
CZ, DE, HU, IT, NL, NO, PL, PT, GB, LT	AT, CZ, NO, SE

Apart from the unit or level decision, it is possible to choose *where in the educational process* to 'measure' quality, i.e. is the emphasis in the accreditation (or evaluation) scheme on input factors, process factors and/or output factors? While in our report we cannot go into that level in any detail, some contrasts are striking (Danish Evaluation Institute, 2003; the reader is referred to Hämäläinen et al., 2001; Vroeijenstijn, 2003). The countries taking part in the so-called 'Joint Quality Initiative' all emphasise that, for them, accreditation ought to depend first and foremost on the proven quality of the graduates, which is the main output factor. The country report on Italy, for instance, shows a contrasting position, in that data required for recognition of study programmes' regulations – note that it is an *ex ante* recognition of *regulations* – of the new two-cycle type concentrate on input: numbers of teaching staff, available facilities, curriculum plans, etc.

The *addressee of decisions* is often the higher education institution's main governance body (rector/president, senate/council), yet the decisions and rights or obligations that follow from them are usually confined to a single programme area, e.g. the right to offer a master's degree programme in chemical technology. Furthermore,

15 One difficulty in applying these rules (hence in categorising countries for the table) lies in cases where smaller units such as faculties coincide with programmes.

accreditation decisions almost invariably carry *consequences for the government*, such as the expectation that it will recognise the degrees awarded and, more materially, that it will fund (a number of) student places in the accredited programmes of study.

With their focus on study programmes, the main emphasis of accreditation schemes is education, or more specifically teaching. Especially in Central and Eastern European countries, the research prowess of the programme's academics as evidenced by their publications is used as an important indicator of input quality into the teaching process.

Actors and Ownership

Governments originated almost all accreditation schemes considered here.¹⁶ Reasons for their interest in quality assurance were given above. In all cases, the academic community co-operated – willy-nilly perhaps, but co-operated. Willingness to co-operate may be surmised to have been fairly large in Central and Eastern Europe, given the widely shared opinion that after 1989 rapid transformation was highly desirable. The equally understandable desire to protect students in these countries from ‘rogue’ higher education provision regrettably was almost indistinguishable from ‘market protection’ by the established public higher education institutions. This resulted in a perverse system in which the underpaid professors of public higher education prevented rapid expansion of the higher education system, thus letting the unmet demand of students persist. It was then catered for by the same professors who made up for their low official income by starting ‘rogue’ private provision of higher education (‘garage universities’).¹⁷ Similar problems of planning through state quota or *numerus clausus* leading to large unmet demand can be found in Portugal and Greece for example.

In Western Europe, there was less collusion between the state and the academic oligarchy. Similarly, and more specifically focusing on accreditation, the Dutch addition of accreditation on top of the previously existing external quality assessment scheme was defended explicitly as a means to re-establish trust in quality assurance, which was seen by stakeholders as not providing transparent information on quality (the background for the accreditation pilot by the HBO Council) and as a system of ‘mutual backscratching’ by the academics from public higher education institutions.

16 The exceptions are the professional accreditations in countries like the United Kingdom, Ireland and Portugal, as well as the accreditation (validation) of some (higher) education institutions by other higher education institutions in Ireland and the United Kingdom.

17 An argument made repeatedly and eloquently by the former president of the Free University of Amsterdam, Harry Brinkman.

The Dutch HBO Council in starting its pilot accreditation project reacted to signals from Dutch employers; this provides a clear example of indirect influence of stakeholders. It also provides one of the few examples of this phenomenon, as in most accreditation schemes the state and the academic oligarchy seem to be the only parties involved. Employers or students are mentioned only very rarely in the country reports. One exception is provided by the German *Akkreditierungsrat*, which counts representatives of stakeholders in its governing board (five representatives of professions and two students among the 17 members; there also is a 'students' accreditation pool'). Another is the Hungarian HAC, which counts two student representatives among its non-voting [sic] members.

HAC is also exceptional in inviting international confirmation of its accreditation scheme, most thoroughly in its international, external evaluation of 2001, and more permanently in its International Advisory Board. Another exception to the dominance of state and academe is professional bodies with accrediting power in the United Kingdom: here, the accreditation scheme is owned by the profession, i.e. by an organisation of stakeholders. These accreditation processes cover only a small part of well-organised professions and are intended to control the quality of new entrants into the professional practice. They are not linked directly to the main evaluation scheme in the United Kingdom (see next section). Similarly, engineers and some other professions in Portugal are (going to be) involved in accreditation-like schemes for higher education programmes for their respective professions.

The operational control over the process and quite often also over the criteria and standards in a national accreditation scheme lies, as a rule, with a national separate body which, at least in the operational aspects, is independent from both the government and the higher education institutions. These national accreditation agencies are usually located near the ministry of education, formal laws as a rule give accreditation its authority to make or propose binding decisions. The German *Akkreditierungsrat*, which is co-controlled by the rectors' conference and ministerial bodies, may be furthest from the state apparatus in our sample, but even this finds its basis in the Framework Law for higher education at the German federal level. There is a representative of the education trade union (GEW) in the board of trustees. This is an exception, approached but distantly by the consultation of the trade unions by the Netherlands Accreditation Organisation (NAO) in its initiation of frameworks. The co-decision between the Czech Accreditation Commission and the ministry of education processes on the content of decrees controlling the accreditation process may be an example close to the other extreme of little distance between government and accreditation agency.

The actual evaluation processes in accreditation schemes almost invariably involve external visiting teams. In most accreditation schemes, these are made up of academics and are under the control of the national accreditation agency (this is the

general Central and Eastern European model). In Germany and the Netherlands, the 'field work' of evaluation is delegated to independent organisations. In Germany, these independent organisations are even given the right to accredit programmes, while the *Akkreditierungsrat* basically limits itself to recognising these accreditation agencies. In the Netherlands, the Netherlands Accreditation Organisation (NAO) retains the right to give final accreditations, and the 'fieldwork' organisations are called 'visiting and judging institutes'. In both cases, these fieldwork organisations can have different make-ups, including representation by stakeholders such as the professions. The more developed German case would show, however, that the academic oligarchy often controls the fieldwork organisations, although the organisations that accredit a single academic area may well be under the control of the profession (explicitly so when they control access to the labour market, as in Portugal or the United Kingdom). Yet even in professions, governmental control is much greater on most of the Continent than in the two cases mentioned. For instance, German lawyers have to pass a *state* examination before being accepted in the labour market.

Formal Rules and Actual Implementation

As a rule, the process of accreditation follows the steps of self-evaluation resulting in a report used by the external review committee that will perform a site visit. The review committee's report will lead to a publication of some sort (van Vught & Westerheijden, 1994). However, in accreditation schemes the publication stage is more complicated. Review teams report to the fieldwork organisation that in turn reports to the national accreditation agency (Germany, the Netherlands), or report to the national accreditation agency directly (Central and Eastern Europe). After further deliberation that may include hearing the evaluated unit's response, the national accreditation agency then publishes its decision (accreditation yes or no – the 'no' often remaining implicit to avoid embarrassment) and in most cases also a more detailed review report.

The validity of an accreditation, once given, stretches from two to ten years. Both extremes are found with British professional bodies. More commonly, validity is four (France), five (NAO for Dutch programmes), or eight years (NAO for Flemish programmes). However, most accreditation schemes are too young to have gone through more than one cycle; therefore it remains to be seen whether the frequencies mentioned will be kept.¹⁸

18 Hämäläinen *et al.* rightly point to programme accreditation as a costly arrangement, and for that reason in the future institutional accreditation may become more common, after a first round of checking all programmes of study (Hämäläinen *et al.*, 2001, pp. 12, 10).

Appeal Procedures

As accreditation, especially state-associated accreditation, may have serious consequences, including closure of existing units of higher education institutions, checks and balances may well be expected to be part of the scheme. One of the ways to achieve this is a two-step process, with an independent vetting of the external review team's judgement by the larger accreditation commission (customary in the US and the Netherlands). In schemes under private law and which are not obligatory, this may be the only checking needed. Another form, which may be more appropriate in cases of official links to governmental decisions, might be appeal to the normal judiciary system. Thirdly, special appeals bodies may be set up to handle complaints (Norway). Finally, incomplete schemes, without checks and balances, may exist as well (as in the Czech Republic, Hungary, Poland).

Consequences of Accreditation

The typical consequences of accreditation, already referred to briefly in the first passage of this section, include the accreditation agency or the government conferring on the higher education institution the status of a certain type of higher education institution, the right to offer a study programme for a certain academic degree as well as the duty for the government to distribute funds for the operation of the programme (often: for a certain number of student places). In the Netherlands, the government's pledge to link its funding to accreditation status is limited to public higher education institutions (in colleges only up to the bachelor's level).

In most countries, the statements made by accreditation agencies are seen officially as advice to the minister of education. However, this advice is not to be taken lightly; in some countries (e.g. the Czech Republic), the minister's rights to diverge from the accreditation committee's advice are delineated in the law on higher education.

For higher education institutions, the funding effect may be seen from two points of view: first, accreditation as a prerequisite, but second, accredited status makes a programme or institution more attractive to students, which in systems where funding depends on student numbers may lead to more funded student places.

From the student's point of view, accreditation means the possibility of obtaining a recognised degree (in the *de jure* or *de facto* controlled professions this may be the only way to enter the labour market) and access to their usual rights (e.g. study grants or loans, free public transport).

Employers (including the public sector) may use the accredited status of a programme or institution as an argument in their decision to recruit one graduate rather than another – in professions with controlled access to the labour market, accreditation may even be a necessity. Similarly, evaluation results may influence employers'

perception of the reputation of programmes or institutions, which again may influence recruitment decisions or decisions to close research or education contracts with certain higher education institutions. From a research point of view, these are, however, expectations or hypotheses rather than statements undergirded by empirical research results (Portugal).

Funding and Fees

There are different patterns of covering the costs of accreditations. On the one hand, there are cases (as in the Czech Republic, Hungary, Poland) where the government covers all costs. On the other, there are cases where the marginal costs for accreditations must be covered by the higher education institutions while the fixed costs for maintaining the national accreditation agency are borne by the government (e.g. Germany, the Netherlands).

Comparison with Accreditation in the United States of America

Accreditation is seen in European higher education as a new phenomenon. Apart from the 'niches' of specialised accreditation in the United Kingdom (and Portugal and some other countries), it was only introduced as a main instrument in national higher education policy, as we saw above, after the fall of communism in 1989. At that time, however, accreditation had already been in use for a century in the United States of America. It had greatly changed over the decades. The first national problem to be solved by accreditation was the entrance of students to higher education institutions: 'At its start, accreditation began with a problem of definition (What is a high school? A college? A medical school?) and the problem of articulation between high schools and colleges and between institutions of higher education.' (Young et al., 1983). With the Higher Education Act of 1952, accreditation started to figure in federal governmental policies. By 1990, it had become the main instrument by which 'an institution or its programs are recognised as meeting *minimum acceptable standards*' (Adelman, 1992). And it continued to change since it influenced developments in Central and Eastern Europe in the early 1990s. But accreditation's principles remained the same, and we now wish to focus on those underlying principles in order to compare schemes on the two sides of the Atlantic.

First of all, accreditation is voluntary in the U.S.A., in contrast to the obligatory character it has in most European countries. The voluntary character must be taken with a pinch of salt, as non-accreditation implies serious consequences for most higher education institutions, and as states within the U.S.A. often require their public higher education institutions to be accredited, like in Europe. The consequences of non-accreditation are different for different types of accreditation and in different fields of study, as will be illustrated below.

There are two types of accreditation in the U.S.A. The most widespread is *institutional accreditation*. This focuses on the characteristics of the institution as a whole, such as educational offerings (and their outcomes – learning outcomes assessment has been an important innovation in U.S. quality assurance in recent decades, instigated by governmental demands), services to students, financial conditions of the institution, and its administrative strength. It is widespread – covering more than 6,400 institutions in 2002 (Eaton, 2003) – because of its consequences, which include eligibility of the institution for certain federal research funds, and eligibility of its students for federal support programmes. There are very few higher education institutions that can afford to let such good income options pass them by. Therefore, it is not just the public higher education institutions that may be required by their state governments to obtain accreditation that undergo this, but also many private higher education institutions, including highly prestigious ones. The category of institutions least accredited includes those that are not research-intensive and that are not dependent on students who are eligible for supports and grants (i.e. full-time students). In other words, the category of institutions that are least accredited includes the teaching-only low-prestige, for-profit¹⁹ private colleges.

Institutional accreditation is operated by six ‘regional’ agencies that each serve most higher education institutions in a number of states. For specialised institutions, e.g. religious ones, there are institutional accreditation agencies that operate throughout the U.S.A. These accreditation agencies also oversee many for-profit colleges (Eaton, 2003).

The second type is *professional or specialised accreditation*. This is accreditation of study programmes against standards of the profession associated with that field and it often secures (easier) access to the profession for graduates of accredited programmes. The specialised accreditation agencies, of which there are about 70, operate nation-wide. In most fields concerned there is a single agency, but in some cases there are two agencies from which programmes might choose. This is the case, for instance, in business studies and for teacher training.

The main contrast between the U.S.A. and Europe is that programme-level evaluation and accreditation in Europe as a rule apply across the board to all fields of knowledge, but that in the U.S.A. (as in the ‘old’ specialised accreditation in the UK) it is applied only to fields in a strong and organised profession. Examples of such fields include the traditional academic professions such as medicine and law, the younger (para-)medical professions such as nursing, engineering, business administration, social work, etc. Also included are fields with strong state interest in

¹⁹ Many of the highly prestigious private universities were founded on a not-for-profit, philanthropic basis.

the profession, the prime example of which is teacher training. Not included are the 'pure' academic programmes (e.g. sociology in contrast to social work).

Usually, specialised accreditation will only analyse programmes in higher education institutions that have already been accredited institutionally. Implicit in the professional character of specialised accreditation is that criteria and standards are strongly influenced by the profession, rather than by academic interests. This is not to say that in the voluntary associations that co-ordinate and operate the accreditation activities, academics are not represented, but the outlook of the whole process is the functioning of practitioners in the non-academic labour market. This contrasts with the strong academic influence in most accreditation schemes in Europe, especially in university sectors of higher education systems, where the main thrust of programme accreditation seems to be acceptance of students for further academic studies (especially in the transition from bachelor to master level), even though the Bologna Declaration introduced 'employability' into the equation.

We already emphasised that accreditation in the U.S.A. is, in principle, voluntary. Hence the organisations that co-ordinate and operate the accreditation activities are basically membership organisations made up of – and paid by (Adelman, 1992) – academics and professionals (the latter are predominant in the case of specialised accreditation) and higher education institutions (in the case of institutional accreditation).

Voluntary organisation implies that the recognition of accreditation agencies is less straightforward than the foundation in law, which is the principal model in Europe. There are two recognition schemes in the U.S.A. First, recognition by the umbrella body of accreditation organisations, the Council for Higher Education Accreditation (CHEA). This is important for accreditation agencies to reassure the public that it follows accepted standards of good practice in accreditation. The genesis of the national umbrella organisations that were CHEA's predecessors, starting in 1949, shows many parallels with discussions after 1998 in Europe around the membership of ENQA (Chambers, 1983).

Second, there is recognition by the federal government. This is very important for most accreditation agencies, as only governmental recognition counts to make students eligible for federal support. The lists of agencies recognised by CHEA and by the U.S. federal government correlate strongly, but not completely: some of the circa 80 agencies are recognised by only one of the two.

Because they are membership organisations, accountable firstly to their members, each accreditation agency defines its own procedures and criteria. Some tendencies towards uniformity result from the self-regulatory co-ordination among the agencies and from the indirect influence of the federal government's criteria to gain its recognition. Institutional accreditation criteria focus on the institution's resources and on

its processes, including quality assurance processes. In quality assurance, the institution's focus on student learning outcomes has been emphasised since the early 1990s, especially since the federal government began to demand such information (Eaton, 2003). Specialised accreditation also collects information on whether student learning outcomes relate to the requirements of the profession. The criteria concerning the programmes reviewed tended to be based on curriculum requirements. Since the announcement of the 'ABET 2000' criteria that focus on student learning outcomes while leaving the curriculum definition mostly to the individual engineering programmes, this has also been the main thrust of development, in teacher training and some other areas. This has a European parallel in the focus on outcomes in terms of graduate competences in a number of European accreditation systems which are based on what we have called the 'Dublin Descriptors' and the 'Tuning' project outcomes.

1.3.3 Evaluation in More Detail

Coverage

As mentioned above (§ 1.2), the beginnings of quality assurance in Western Europe were in the area of evaluation, not accreditation. Because of the different policy interests, but also considerations of institutional autonomy, the emphases were different. In many cases, the programme level was targeted for evaluation ('quality assessment'), as it would give the most detailed information, whether for accountability or for improvement purposes. To stress the higher education institution's responsibility for quality as an expression of its autonomy, in some cases quality audits of the institution were the main mechanism of evaluation in Sweden and the United Kingdom (for some periods). In the United Kingdom, the size of the higher education system, and hence the costs of a programme level evaluation scheme, may have been another reason for the initial focus on the institutional level. In 2001, the 'evaluation fatigue' that spurred the 'revolt' of the higher education institutions against the QAA schemes of the late 1990s clearly focused on the costs (in terms of money and manpower) of programme level assessments for the universities.

Where higher education institutions as a whole are evaluated, there is a tendency to analyse the institutions' arrangements for quality assurance rather than their teaching or research directly (although this was the aim of the 'total evaluations' in Finland). Such 'quality audits' were the mainstay of evaluation in Sweden (before 2001), Ireland (university sector, from 2003 onwards),²⁰ and in the United Kingdom (espe-

²⁰ In 2003, the HEA announced it would begin to audit the universities' quality assurance arrangements (Conference of Heads of Irish Universities, 2003).

cially England, since Scotland has its own arrangements) in the periods mentioned in the table.

Table 7. Unit of judgement in evaluation schemes

Programme of study	Higher education institution
FR (sometimes), NL (pre-2003), PT, SE (after 2001), GB (1992–2002)	FI, FR (regular case), SE (pre-2001), GB (before 1997 + since 2002), IR (as from 2003)

Geographically, the aim of all countries' governments seems to be to cover all parts of the country. In federal states, therefore, a set of regional evaluation agencies is aimed at (Spain), although in Germany until bachelor's and master's programmes become universal (cf. Schwarz-Hahn & Rehburg, 2004), most of the country will not be covered by formal evaluation activities (main exception: Lower Saxony with ZEvA).

As a rule, government-initiated or government-supported evaluation schemes cover all public higher education institutions or programmes. In Flanders and in the Netherlands, separate evaluation schemes existed for universities and for colleges (before the introduction of accreditation in 2003).

Actors and Ownership

In the sub-section on actors and ownership in accreditation schemes (see § 1.3.2), we mentioned that co-operation between state and academe was not very close. The 'ideal type' of this would be the development of evaluation schemes in the United Kingdom under the Thatcher government, which was a clear example of evaluation as an instrument which showed a dramatic lack of trust in the performance of the (university part of) the higher education system (Trow, 1994, 1996), while ostensibly maintaining the institutions' autonomy.

A logical prerequisite for any quality assurance scheme (accreditation or evaluation) to function properly is the existence of an internal quality assurance system within the higher education institutions. While this is not the focus of our study, it is interesting to note that internal quality assurance is mentioned explicitly in higher education laws in Hungary and Norway.

The evaluators, i.e. the members of review teams, mainly come from the academic world. However, involving a minority representation of other stakeholders (professions, employers) is widespread practice (Flanders, France, the Netherlands pre-2003, Norway, Portugal, Sweden). In fewer cases, student representatives also take part in the external review teams (the Netherlands pre-2003, Sweden).

Formal Rules and Actual Implementation

The total duration of evaluation processes is about one year. This was also the approximate duration of evaluation activities (Flanders, France, the Netherlands pre-2003²¹), although exceptions exist in many higher education systems for different reasons.

Consequences of Evaluation

Consequences of evaluation depended heavily on the functions for which it was introduced. If accountability was the main aim, and if governments stopped short of official recognition decisions (which would transform the evaluation scheme into accreditation), there may have been few direct consequences.

If quality improvement was a main aim, giving consequences to evaluation was normally in the hands of the higher education institutions being evaluated. After all, it is within the higher education institution that quality of education is 'produced'; paraphrasing Dill: quality cannot be 'inspected in' from the outside (Dill, 1995). One might equally question whether collecting officially required data – even setting up special *observatoires* for that purpose (France, Italy) – gives an impetus to the higher education institution's desire to engage in quality management, or whether it is seen as just another bureaucratic burden to be executed, bearing as little connection to the 'inner life' of the higher education institution as possible? (Higher education institutions have been known as 'loosely coupled' organisations anyway (Weick, 1976), but this could add to the looseness.)

In some countries, different official arrangements to monitor – and in that way ensure – follow-up were introduced (e.g. Flanders, the United Kingdom, the Netherlands pre-2003, Sweden) (Scheele et al., 1998). Research led to the conclusion, however, that 'really poor teaching' (as it was characterised in the United Kingdom) may have been weeded out but above the actual threshold level of quality (i.e. as long as one does not get too heavy criticism from the review teams) the impetus for quality improvement from external evaluations remained rare (Jeliazkova & Westerheijden, 2000; Jeliazkova & Westerheijden, 2002).

To the extent that information was aimed at through evaluation, the proof of the pudding would be that students made more informed choices in selecting their location of study. Actual empirical research on this question was not mentioned in the reports underlying the present study. Anecdotal evidence seems to suggest that for prospective students in well-provided public higher education systems such as in

21 This period was the rule in the Netherlands for the universities; with the substantially larger number of study programmes to be reviewed in the colleges, review processes from initiation to publication of the national report could take up to two years for the HBO Council.

North-Western Europe, other arguments were more important in their choice than perceived quality differences (e.g. where did friends go to study, distance from the parents' home).

With regard to the consequences of evaluation for government decision-making, opinions still remain divided on the paradoxical situation (Westerheijden, 1990) between the standpoint that real consequences, i.e. incremental or decremental funding, are necessary to take evaluation seriously, and the standpoint that attaching real consequences to evaluation turns it into a power game where the results count more than the quality. As a way out of this paradox, many governments have stated that evaluation results may inform funding, but in a non-formulaic way (the United Kingdom, the Netherlands pre -2003), e.g. through contract negotiations (France).

Funding and Fees

In the United Kingdom and the Netherlands (pre-2003), for example, the costs of external evaluation are paid for by the higher education institutions, basically by subscribing to the umbrella body (VSNU, HBO Council) or quality assurance body (QAA). QAA is a hybrid case: most tasks (hence much of its funding) are contracted to it by the Funding Councils for England, Scotland and Wales – i.e. it is indirectly funded by the government.

In most other country cases, evaluation agencies are state agencies, funded by the government budget.

1.3.4 Approval in More Detail

Approval was defined at the outset as granting a programme or unit the right to exist. In principle, this was the way to create new study programmes or (public) higher education institutions, faculties, etc. in state-controlled systems. Traditionally, approval was a task for a minister of education and the decisions were prepared, as all ministerial decisions, by civil servants. While the principles of bureaucratic decision-making (in its value-neutral, Weberian sense) are division of labour and application of expert knowledge, nowadays it is increasingly accepted that civil servants do not possess sufficient expert knowledge for their decisions (technically: proposals for ministerial decisions) to carry legitimacy with the academic community. This may have been one of the reasons for the rise of evaluation and accreditation.

From this arises the issue of the expertise needed for a legitimate approval decision. In other words, where is the borderline between approval and accreditation? In Weber's ideal type analysis, this question had a simple answer. Approval is advice given for a decision made by (permanent) civil servants, within the ministry, based on paper evidence collected either by the ministry or by its agent. This agent could

be an intermediary body or a public higher education institution – in the ideal type state hierarchy it is not material where in the chain of command information is collected. At the other extreme, accreditation is performed by academic peers working in (*ad hoc*) committees in a collegial rather than a hierarchical manner (Clark, 1983) on the basis of site visits, including interviews, as much as on paper evidence. However, as Weber wanted to emphasise in introducing ideal type reasoning, the world is not as clear-cut. We find cases where external bodies involving academic reviewers prepare (and pre-judge) ministerial approval decisions on paper evidence without site visits (Lithuania), or with a site visit by quality assessment agency staff (Denmark). In contrast, in a curious mix of traditional bureaucracy, new public management and collegial academic control, we also find cases where civil servants negotiate recurrent contracts with higher education institutions about time-limited approval of study programmes, sometimes advised by experts from different intermediary bodies (France). In sum, it remains impossible to decide once and for all how much ‘evaluation’ is needed to call ‘approval’ ‘accreditation’. In some cases, it depended on national political sensitivities or on the way the authors of country reports interpreted our definitions whether certain decision-making processes were called ‘approval’ or ‘accreditation’.

Coverage

As a rule, approval is required for all higher education units, and often also for all individual study programmes. The essence of approval, i.e. the ministerial decision to grant programmes or institutions the right to exist, remains a key element in European higher education systems. Especially, as higher education authorities in Europe have made clear time and again that higher education is seen as a public good. Moreover, other actors and stakeholders generally hold the same view: they want government recognition of the degree(s) and government funding of the programme or institution. Yet there are higher education systems in which private institutions can operate without government approval (e.g. Denmark, but not applying for approval implies no funding).

Private funding and private accreditation are generally only seen as equally or more relevant than governmental approval in some areas, such as postgraduate MBA programmes. Hence, the approval decision can be seen as the culmination of approval, accreditation and even some evaluation processes in the countries involved.

Actors and Ownership

The main actor in any approval scheme is, by definition, the top higher education authority in a higher education system. As a rule, this is the national government. Even in federal countries, where regional state governments may share part of the authority (e.g. Spain, Germany), national laws set the framework under which re-

gional states operate. The extreme case of devolution may be Belgium, where the language communities each decide their own legal decrees, which may even include funding arrangements, independently from the national government.

Formal Rules and Actual Implementation

In the country reports, no indications were given of major discrepancies between formal rules regarding approval and their actual implementation. Although this may well be the case, it may also reflect the focus of attention of the country reports. We concentrated on the accreditation and evaluation schemes, taking the approval schemes as a point of departure and did not elaborate much on problems arising from them.

Consequences of Approval

Our definition of ‘approval’ was that it granted a unit or programme the right to exist. With this key decision invariably come other rights, unless accreditation or evaluation schemes have been introduced to help make those further decisions. These rights include the recognition of degrees (or the autonomy to award degrees), and government funding according to a given process or algorithm.

Funding and Fees

Governmental approval is free of charge in all higher education institutions in the countries under study. In other words, it is paid for by the government authority that performs it.

1.4 Drivers and Dynamics

Actors involved in an evaluation or accreditation scheme learn during its implementation (as one of us stated in Huitema, Jeliaskova, & Westerheijden, 2002). For example, staff and leadership in institutions learn the art of self-evaluation. Learning leads to changes in the way actors in the higher education system behave. This is what is intended: giving greater attention to the quality of teaching is a precondition for quality improvement. However, once the ‘easy wins’ have been called as a result of a successful first round of evaluations, a second (unchanged) round cannot add as much quality improvement or accountability as the first did. Routine, bureaucratisation and window dressing are dangers lurking behind. To counteract these tendencies, quality assurance systems need to be designed with a built-in facility for positive change. This can be seen as an *internal* drive for dynamism in evaluation and accreditation schemes. Moreover, there is a – loosely hierarchical – scale of perceived problems which quality assurance systems are expected to address. Tackling one problem (a political decision or compromise and a temporal state of affairs, not

necessarily an actual solution to the issue) exposes another one. Attempts to address a ‘subsequent’ problem may be futile before a ‘more basic’ one has been brought to closure. We single out these changes in the *immediate* context of quality assurance systems as *contextual dynamics*. Both internal and external drives would lead any evaluation scheme to evolve from checking basic quality through accreditation-like processes, through efficiency-enhancing measures, to quality improvement and quality culture enhancing schemes (Campbell & Rozsnyai, 2002; Huitema et al., 2002). But this inherent logic is not visible in most countries’ developments, which ostensibly do not follow the progression of phases proposed in that paper. External dynamics are apparently more important. What are the main drivers in the context of higher education policy that influence the dynamics of evaluation, accreditation and approval schemes, according to the country reports?

For Hämäläinen et al., a central question was ‘Why has accreditation become a central issue?’ They gave three answers (Hämäläinen et al., 2001, pp. 14–17):

- ‘Trust and accountability’, i.e. the New Public Management agenda;
- ‘A common labour market and student mobility requirements’, i.e. the Bologna agenda;
- ‘Borderless markets for higher education’, i.e. the globalisation agenda, leading to ‘proliferation of accreditation systems’ starting in the USA and even to the rise of some ‘trans-national accreditation systems’.

Our findings underscore these earlier answers, even though we focus on the Bologna agenda.

Chronologically, the first main changes to traditional state-centred steering of higher education occurred in some Western European countries during the 1980s. Researchers on higher education have monitored and analysed these developments since (e.g. Neave, 1988, 1994, 1998, 2002; van Vught, 1988). Of course, governments had engaged in restructuring higher education systems before, but in contrast to the big reform projects of the 1960s and 1970s (cf. Cerych & Sabatier, 1986), the ‘philosophy’ underlying the changes in the 1980s was the rise of New Public Management (amongst many others, cf. McKevitt & Lawton, 1994; Pollitt & Bouckaert, 2000). For higher education, this implied more emphasis on self-regulation, apparently inaugurating a renewed era of institutional autonomy. However, this new autonomy was only given in exchange for increased accountability to (the rest of) government and society, and thus evaluation schemes were introduced in one Western European higher education system after another, as the country reports in this volume show.

The first large-scale appearance of accreditation in the higher education systems of Europe was an immediate consequence of the post-Communist transformation in the Central and Eastern European countries from 1990 onwards (see also § 1.2 above).

As long as higher education was under strict government control, i.e. until 1989 in Central and Eastern European countries, accreditation as an independent check on minimum quality was not necessary for those societies. It was only when the market was opened to private and foreign providers, and in a period when government control was suspect because the transition from Communism was still incomplete, that accreditation surfaced as the option that carried most credibility in society. Its character of independent, non-political, academic expert opinion was highly valued. In theoretical terms, this can be seen as a mixture of the globalisation agenda (foreign providers) and the neo-liberal ideas that were popular in reaction to Communism and underlied the New Public Management agenda (private higher education provision, less government intervention).

Before then, and continuing alongside the large-scale accreditation schemes, some professions in certain countries were already accrediting study programmes. This required two enabling factors: on the one hand a certain level of organisation and self-regulation within the professions, and on the other a certain degree of independence from state control. Hence, the bar association in the United Kingdom and Ireland had developed accreditation procedures, while in Germany and similar countries entry to the legal profession was controlled by the government through a *Staatsexamen*. In this German examination, legal professionals set the standards and take the examinations, but under the authority of the state, not of their own profession. In addition to these enabling factors, a demand factor was needed, as shown by two of the other standard examples: business studies and engineering. These fields have a relatively highly developed international labour market. Demand from employers and students for clear information about the qualities of the study programmes (and their 'typical' graduates) may therefore also be expected to be highly developed. This paragraph, then, points to another aspect of the development of an international or European labour market, which is not clearly encapsulated in the Bologna process, and although encompassing many aspects, remains focused on state-driven and state-oriented evaluation and accreditation schemes, rather than on the independent role of the professions.

It was only with the Sorbonne and Bologna Declarations that a situation arose in Western European countries' higher education systems that was somewhat similar to the one in the Central and Eastern European countries, and led to introduction of the same instrument of accreditation. Although it was an assumption that underlied our entire project, so that we could be accused of being biased, the country reports underline that the Bologna Declaration was a key driver for the change towards accreditation schemes in Western Europe. At the same time, the fact that all the countries in this volume are signatories of the Bologna Declaration implies that it influences all European policies with regard to evaluation and accreditation. Yet, given that the starting positions of the countries were so different, the impact of the Bologna Declaration varies across the countries. In Western Europe, a discussion about

accreditation has been launched, leading to reactions ranging from rejection (Denmark) to rapid introduction (above all Germany). In Central and Eastern Europe, the Bologna process occurs in the context of the region's reintegration in Europe and the preparation for membership in the European Union (e.g. Latvian and Polish country reports). Reintegration has been part of the outlook since 1990, so this European dimension may have been strengthened since 1999, but it did not require a very great change of direction in the accreditation schemes.

Its importance at the level of policy-makers does not automatically entail that the Bologna discussion permeates all the European higher education systems. The *Trends III* report notes that, according to its survey:

In Estonia, Lithuania, Sweden, Germany, Ireland and most strongly the UK, deliberations on institutional Bologna reforms are even less widespread than in the other Bologna signatory countries. (Reichert & Tauch, 2003, p. 9.)

First of all, this implies – in its almost sarcastic phrasing – that the Bologna discussion is not high on the agenda beyond the circles of those who have a professional interest. Second, this finding mingles countries from all over Europe with and without two-cycle study structures as less than averagely interested in the Bologna discussion. Hence, what may be the driving factors for the Bologna discussion being high on the academic community's agenda cannot be found in obvious systemic factors and our country reports do not give insight into this question either. The insights that they do give are the subject of our final section.

1.5 Conclusions

1.5.1 System Dynamics

In Central and Eastern Europe, the main driving force for introducing accreditation was the transformation after 1989. In Western Europe, the Bologna Declaration spurred new design activities with regard to quality assurance, often in the form of accreditation schemes (Germany, the Netherlands, Norway, Spain and most recently Portugal). In some Western countries, the self-organisation of some professions must also be mentioned as a driver for (non-state) accreditation and evaluation schemes (the United Kingdom, Portugal).

Internal politics were among the main driving forces in Germany. The federal system with shared responsibility of higher education between the states (*Länder*) and the federal level (*Bund*) made the higher education system extremely resistant to change. The Sorbonne and Bologna Declarations may thus be interpreted as creating external pressure to overcome internal inertia (van der Wende & Westerheijden, 2001).

An additional impetus to establish or improve quality assurance schemes with an official nature seems to come from the press. University rankings are a major seller for weekly magazines in several countries (e.g. Germany, the Netherlands, Norway, Poland, Sweden, the United Kingdom), and the sometimes scathing methodical comments from higher education institutions or researchers (e.g. Yorke, 1998) and ministerial officials seem to call for an attitude that could be summarised as: 'we had rather do something (better) ourselves'. Partly as a response to this attitude, partly as a driver for magazines to become interested, in many countries ministries of education or umbrella bodies of higher education institutions publish annual 'performance indicator' lists (e.g. France, the United Kingdom, the Netherlands). International agencies also publish regular information often regarded as performance indicators for countries in international competition (OECD's annual *Education at a Glance*, EU's recent 'open co-ordination mechanism').

1.5.2 Development and Reform

The Bologna process is an obvious driver for change with regard to quality in steering mechanisms.²² Germany, the Netherlands, Norway and Spain are cases where accreditation has been introduced on Bologna-associated arguments. In France, the introduction of a new master's degree has been argued on the same grounds and will be accompanied by some form of accreditation, although the scheme is still being debated. In the United Kingdom, it seems that in a recent policy paper entitled the 'Future of higher education' Bologna and European issues can be glossed over when making reference to international issues.

Already in the 1990s, active 'mimicking' or borrowing of evaluation and accreditation schemes took place on a large scale (Robertson & Waltman, 1992; van Vught, 1996). In some cases, there seemed to be just one obvious example in the world, which explains why in practically all documentation on accreditation schemes the USA plays an important (if often misunderstood) role. In most cases, however, there were several possible role models, but only one was chosen. For instance, Irish arrangements were and still are based on (some parts of) the British example because much of the Irish institutional arrangement for steering higher education was similar to the higher education system in the United Kingdom (the occasion for which cardinal Newman formulated the 'British' higher education philosophy was the opening of a university in Ireland). Accordingly, similar effects could be expected from borrowing new policy instruments, thus increasing the chance of achieving desired aims and decreasing the chance of unintended and undesired consequences. Similar pat-

22 In some of these countries, broader changes have been initiated as well, notably in degree structures (e.g. Italy, the Netherlands, to some extent Germany). Ireland is a major case, showing the influence of the European level in the expansion of the higher education system.

terms of cultural and institutional pre-dispositions to turn to a certain model can be found elsewhere – this is the very reason why we are able to recognise certain regions within Europe. On the other hand, some proponents of certain evaluation schemes were active ‘sellers’ of their model; the popularity of the ‘Dutch model’ of evaluation in the 1990s can to some extent be explained by this (Flanders, Denmark, Portugal).

However, in borrowing (some elements) of models for evaluation or accreditation from other countries, adaptations have to be made to the new context in which the model is being introduced. This is good policy, as instruments have to be fitted into an existing legal, institutional etc. framework, yet it makes the question of what one higher education system can learn from another much more difficult. Thus, while both Denmark and Portugal claimed to have used the Dutch evaluation as a model, they were rather different from one another as well as from the original. Moreover, some complexities of the American accreditation and evaluation schemes cannot be copied easily in European countries, e.g. those that have to do with the limited influence of the government in the USA and with the differential treatment of professional as against other programmes of study.

The dynamics of quality assurance schemes (evaluation and accreditation alike), explaining how they are connected to social problems/situations to which they are supposed to respond, have been mentioned at the beginning of this chapter. Yet, there are also internal dynamics involved, with ‘easy wins’ being made in early iterations and dangers of ‘bureaucratisation’ and ‘window dressing’ lurking if quality assurance schemes are copied without sufficient modifications (Jeliazkova & Westerheijden, 2002). The importance of internal dynamics and how they relate to the development of evaluation or accreditation schemes can be demonstrated clearly in the United Kingdom as well as in Greece, where after many years of controversial preparation, the establishment of a National Quality Assurance and Evaluation Committee was proposed in March 2003.

Finally, we should remember that in whatever form we put the assurance of quality, quality of higher education is one of the main drivers of the Bologna process:

... together with the preparation of graduates for a European labour market, it is the improvement of academic quality which is seen as the most important driving force of the Bologna process, not just at the institutional level but also at the level of governments and rectors conferences. (Reichert & Tauch, 2003, p. 100.)

Seen from that perspective, that is to say looking at our subject from the opposite point of view, accreditation and evaluation schemes are major factors in shaping the European Higher Education Area. Our hope is that readers, arriving at the end of this chapter, may have a clearer picture of where developments are taking us – and where they themselves may take developments.

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