Subject	Operating an External Quality Agency
Segment	Structures and Management
Topic	1.5 Credibility, Accountability and Stakeholder Relations

Table of Contents

1. Introduction

QA agencies are accountable to many stakeholders, not least their owners be they government or a collective of institutions. They must demonstrate to stakeholders that the EQA processes they conduct are credible, objective, and that the outcome is reliable. This topic outlines ways in which agencies establish and maintain credibility and also deals with the various accountability measures used to demonstrate that the agency achieves its objectives.

Objectives: Credibility, Accountability and Stakeholder Relations

Upon completion of this topic, you should be able to
- identify stakeholders and explain their interests
- explain the factors that contribute to the credibility of EQA programs
- describe the mechanisms used to ensure the accountability of QA agencies

2. Stakeholder Interests

Who or what can be considered as stakeholders for a particular quality agency depends primarily on the purpose of the agency. For example, if an agency is intended to build QA capacity in HEIs and help them improve, the HEIs are likely to be among the principal stakeholders. If the agency's task substantially relates to government funding, or determination of which institutions meet standards for funding, then the government takes prime position.

In general terms, agencies should understand certain groups have a stake in QA for institutions and programs; e.g.,
- Government
- HEIs, their faculty and staff
- Employers, business, and industry
- Potential and current students
- Alumni
- Society
- Professional associations

How the agency recognises these groups varies enormously but it is safe to say that an agency should seek their input for planning, their comments on its processes, and their views on how each can be served by the agency.

Potential and current students often find agency reports opaque, technical, and filled with jargon. A bit of interaction here might result in clearer and more useful reports. Still, there is a basic problem with expectations. Accreditation reports closely adhere to criteria written in dry and undramatic language. References to individuals are virtually non-existent, so those who expect to read harsh criticisms can only be disappointed.

Professional associations are concerned with quality, to the extent that they set educational standards for membership. An external quality agency may collaborate with associations, as sources of expertise and volunteers for peer review activities. It should be understood, however, that some associations may not have the right expertise for EQA tasks. Such would be the case with a professional body with a primary concern for professional distinctions and honours, but little or no interest in first professional degrees. An agency should conduct orientation programs to clarify the nature and purpose of EQA and to demonstrate the connection between QA and effective management.

Employers may criticise the quality of graduates, and remain unaware of the role played by quality agencies in enhancing quality. Direct liaison with employers can help to overcome mismatches in expectations and outcomes.

All EQA actions can be difficult and time-consuming. Most are not one-off events, but processes that take time. Nonetheless, making the effort enhances the standing and credibility of an agency, and may provide it with useful inputs and insights.

3. Credibility of the QA Process

Institutional involvement in EQA has a tangible cost in staff time and financial resources. Institutions are unlikely to be committed to such an effort unless they believe that the EQA process is credible. Without institutional commitment, the value of the process to the institution and the likelihood of a positive outcome will be low. Thus, it is important for the QA agency to establish its credibility in the eyes of institutions.

The credibility of an EQA process rests on a combination of factors, including:
- clarity of policies;
- appropriateness (objectives) of the EQA framework;
- institutional involvement in developing norms and criteria;
- thorough and transparent procedures;
- rigorous implementation of procedures;
- decisions and judgments that are regarded as fair, valid, and useful;
- competence and professional integrity of QA agency staff and volunteers;
- achieving the desired impact on the higher education system; and.
- having safeguards to maintain the professional standard of the agency

The way that these goals are pursued will vary from one situation to the next. In systems that stress compliance with specific performance standards, the agency may have a mandate to identify and disqualify low-quality providers. In that scenario, open discussions about criteria with institutional stakeholders must be approached with care although the better institutions are usually willing to assist in the creation of an agency that will weed out institutions that discredit the HE sector. It is crucial however that maintenance of vested interests is avoided. The more stringent the

EQA process, the greater the importance of strong provisions for appeal, since the agency may gain credibility through its handling of appeals.

Positive Institutional Relations

A QA agency must comprehend the nature of the institutions it serves and their work. This does not mean that it must agree with all that an institution does, but it must understand why institutions act in particular ways. If the agency observes inappropriate actions, it can respond in terms that make sense to the institution.

Training programs and constructive interaction with client institutions help to build institutional support for an agency. Credibility is built when institutions are treated as equal partners in a joint venture, not only for EQA implementation, but also as witnesses to the effect and credibility of an EQA program.

When it comes to the make-up of review teams, in some jurisdictions, institutions have almost no say in composition of review teams, while in others they have too much influence. Consulting with institutions when forming teams is considered good practice. Experience demonstrates the futility of sending out teams whose judgment will not be accepted by the institution. This may serve compliance but without promoting improvement. Nonetheless, the agency must make the final decision on the composition of the review team.

After a site visit and decision, credibility can be strengthened by collecting feedback from the institution and key players in the process, and using that input to effect improvements. As mentioned earlier, the provisions for appeal can reflect favourably on the credibility and accountability of an agency.

A Stable Quality Assurance Framework

The QA framework in use must be consistent in its approach, but amenable to change. Fine-tuning is essential to the growth of a newly-established agency, but too many changes made too often will undermine institutional confidence.

The framework should be responsive to local concerns, while its core elements remain consistent with international developments. This can be done if the agency systematically reflects on its objectives and clearly states what it intends to do over a five to seven year period. That forward view should be informed by benchmarking activities, including meaningful participation in regional and international QA networks.

Integrity of the People Involved

Once an EQA framework is in place, much of its credibility will depend on the people who implement it. Care should be taken to select experts who are known for their integrity. In turn, institutions must be able to trust the visiting experts in terms of their knowledge and professionalism.

While the qualifications and talents of the members of assessment teams are critical to the credibility of the entire process, the professionalism with which the review process is planned and implemented by agency staff is of equal importance to the success of review teams. Even a highly-qualified team can be undermined if the agency is not clear in its expectations or lacks professionalism in making preparations for site visits.

One of the more common problems to be dealt with by an QA agency is the (often late) submission of incomplete or deficient self-assessment (SA) reports. In the worst scenario, the review team receives the SA report so late that the members must digest the report on the night before the review. When there are gaps and

questions that have been left unanswered, the QA protocols cannot be applied in full. In effect, the institution will have 'failed' the review before it began. In these circumstances, agency staff should, in consultation with the review chair, suspend the process, pending timely receipt of an acceptable SA report.

Team preparation always needs attention. It is unlikely that a single reviewer will be acquainted with every functional aspect of a complex or large institution, or the particulars of every program. The agency must make sure that its reviewers have sufficient information on which to base fair judgments. The information should be provided by the institution, or be readily accessible elsewhere for example, on the institution's website.

Team composition is no less a challenge. Every person's perception of quality is influenced by many factors, some beyond the control of the agency or its ability to change perceptions in a short training program. Thus, agency staff must configure visiting teams with a view toward balanced and reliable judgments. The aggregate of team skills and personalities should ensure both fairness and the ability to resolve multiple points of view.

Conflict of interest (COA) policy needs a mention here. Although the reviewers may be experts generally known for integrity, it is important to have an explicit COA policy and to request written confirmation from reviewers that there are no factors that might influence how they approach a particular review. Potential conflicts of interest among agency staff should also be addressed. In addition, reviewers should be asked to make an undertaking to keep confidential all information received in the course of the review be that written or oral. The reviewers should be asked to agree to destroying documents in a secure way at the end of the review.

Clarity and Transparency

The EQA framework should be sensitive to the local context as well as consistent with pertinent international developments. Lack of clarity in the framework may result in the agency trying to achieve conflicting objectives through the same procedure. The agency's objectives should be clearly stated and built into a strategic plan (for perhaps a five to seven year period).

An agency can ensure credibility through clear and transparent procedures that are rigorously applied along with a fair appeals system. Here again, training programs and collaborative work with institutions will help to build support for the policies and procedures of QA agencies.

4. Accountability

Accountability deals with the use of resources or output, i.e., an agency is accountable for what it has, or has not, done. Hence, QA agencies must explicitly demonstrate their accountability to a variety of stakeholders. This section discusses the mechanisms used to ensure accountability of QA agencies to their stakeholder groups.

Involvement of owners and funders

In a narrow sense, QA agencies are accountable to their owners and funders, who are not necessarily the same. Most agencies are owned, funded, and possibly operated by a combination of government and institutions. For example, government may 'own' an agency but charge institutions for service on the principle of 'user pays'. World-wide, we find various combinations: agencies that are totally funded by government, some that are partially funded, and some that receive no government

funds. Specialised accreditation is generally supported by a combination of institutional fees and funding by professional associations.

Government ownership, whether total or partial, is often visible through government officials representing the ministry of education of the jurisdiction, and sitting on (or even chairing) the agency governing body. This is a more implicit, input-oriented 'accountability' mechanism, but the government may have more explicit accountability measures in place, such as annual performance reports or a periodic re-certification process.

Similarly, institutional 'ownership' is usually expressed by the presence of institutional representatives forming a majority of the governing body. In both cases, the governing body may contain representatives of the wider society, employers, and/or professional bodies. These people are expected to bring a broader perspective to the agency's work and, by reporting to their constituencies, they provide another way to hold the agency accountable.

Stakeholders should be involved from the outset in shaping and monitoring the EQA processes. Input should be obtained from a cross-section of the academic community, as part of the agency governance scheme. Agency boards may enlist representatives from the public, employer bodies, or professional associations. Having an international presence on the governing body is another way to obtain an external perspective on policies and procedures.

Reporting

A fundamental way for an agency to demonstrate accountability is to submit its plans and annual reports to its owners and funders. QA agencies generally submit their plans and annual reports to their governing bodies and from there to government as appropriate. These reports are often made public to ensure transparency and accountability.

Some examples of practices from Indonesia and Canada are:
- The Badan Akreditasi Nasional - Perguruan Tinggi (BAN-PT) of Indonesia, submits annual reports to the government and its activities are guided by the annual budget allotted to it by the government.
- The Ontario Council on Graduate Studies (OCGS) established by the Council of Ontario Universities (COU) has the mandate "to report in writing to COU at least once a year on its activities of the past year".

The International Network for Quality Assurance Agencies in Higher Education (INQAAHE) has outlined some general principles to be adopted for reporting to the general public:

[Guidelines of Good Practice (INQAAHE): Reporting Public Information](#)

Guidelines of Good Practice (INQAAHE): Reporting Public Information

The External Quality Assurance Agencies (EQAA) informs and responds to the public in accordance with applicable legislation and the cultural context of the EQAA. This includes full and clear disclosures of its relevant document such as policies, procedures and criteria.

The EQAA also demonstrates public accountability by reporting its decisions about higher education institutions and programs. The context and extent of reporting may vary with cultural context and applicable legal requirements.

If the external evaluation leads to a decision about the higher education institution or program, the procedure applied and the criteria for decision-making are public, and the criteria for review are transparent public, and ensure equality of treatment.

The EQAA also discloses to the public the decisions about the EQAA resulting from any external review of its own performance.

Source: International Network for Quality Assurance Agencies in Higher Education website

Recognition by a QA umbrella organisation

QA agencies may seek recognition from a reputable umbrella organisation as an accountability measure. Recognition by an appropriate and well-regarded umbrella organisation says much about the agency's commitment to quality. Specifically, it shows a commitment to:
* advance academic quality;
* demonstrate agency accountability;
* encourage improvement of the agency;
* the use of fair and productive procedures;
* ongoing assessment of accreditation practices; and
* the sustainability of the agency.

Let us consider examples from the US and Australia.

Recognition of QA Agencies

USA

Regional accrediting bodies, established by institutional associations, first seek recognition from the US Department of Education (USDE), and more for political reasons, from the Council on Higher Education Accreditation (CHEA). Institutions must be accredited by a USDE-recognised agency to have access to Federal funds, notably student aid, grants, and institutional subsidies. State governments may also abide by such recognition. The USDE only recognises agencies that demonstrate a "Federal purpose"; i.e., to be a 'gatekeeper' for Federal funding. Most specialized accreditors, focused as they are on programs, do not serve that purpose, but may obtain CHEA recognition (by standards parallel to those of the USDE). Even then, CHEA recognition does not open the door to Federal funding. U.S. institutions patronise agencies that are duly recognised as gatekeepers, but make exceptions for the accreditation of professional studies (e.g., engineering). This chain of recognition is, for all practical intents, not voluntary.

Accrediting organisations are expected to advance academic quality, demonstrate accountability, encourage improvement, employ appropriate procedures, continually reassess accreditation practices and possess sufficient resources. The agency recognition process involves an evaluation similar to the accreditation exercise that [external quality agencies] apply to HEIs, with a self-study and external review. Agency approval runs in six-year cycles.

Australia

In Australia, AUQA is responsible for conducting quality audits of state and territorial governments' higher education accreditation authorities. This happens on a five-yearly cycle. Action taken in response to audit reports is the responsibility of the relevant government department and minister. As a federal quality agency AUQA itself is subject to review and accountability requirements.

Germany and the Philippines have arrangements similar to those of the US.

Recognition processes for QA agencies are similar to HEI review processes, that is with self-study and external review processes and, usually, an opportunity for the public to comment. An example of how this process of reviewing a QA agency may be overseen is the way it is handled by the US-based Council for Higher Education Accreditation (CHEA)

[Accountability of QA agencies: Council for Higher Education Accreditation (CHEA)](#)

Accountability of QA agencies: Council for Higher Education Accreditation (CHEA)

Accountability of QA agencies:

Council for Higher Education Accreditation (CHEA)

CHEA carries forward a long tradition that the recognition of accrediting organisations should be a key element in efforts to ensure quality, accountability, and improvement in higher education. CHEA recognition affirms that the standards and processes of accrediting organisations are consistent with CHEA expectations for quality, improvement, and accountability. CHEA will recognise regional, specialised, national, and professional accrediting organisations.

CHEA recognition of accrediting organisations has three basic purposes:
- TO ADVANCE ACADEMIC QUALITY. ...
- TO DEMONSTRATE ACCOUNTABILITY. To confirm that accrediting organisations have standards that ensure accountability through consistent, clear, and coherent communication to the public and the higher education community about the results of educational efforts. Accountability also includes a commitment by the accrediting organisation to involve the public in accreditation decision-making.
- TO ENCOURAGE PURPOSEFUL CHANGE AND NEEDED IMPROVEMENT. ....

Source: Council on Higher Education Accreditation website

Acceptance by peer agencies

QA agencies may voluntarily join networks and follow commonly accepted principles and practices as a strategy for demonstrating accountability. Although individual agencies may not have accountability concerns as the main driver for joining

networks, adherence to common standards and criteria serves to show a concern with accountability and a commitment to professionalism.

The international networks of QA agencies have, in recent years, focused attention on this question: what is a good QA system? Discussions have been based on producing a set of characteristics or aspects that should be incorporated in an effective QA framework built on principles of good practice, guidelines, and recommendations for QA agencies. While 'standards' are sometimes mentioned the focus is more often on promoting general principles and sound practices to help agencies make improvements. A key element in these endeavours is the sharing of experiences with other QA agencies. The desired outcome in each case is a framework that provides a reference point which is collectively agreed upon by a group of stakeholders, such that they could become standards applied consistently among agencies and their constituents.

Some intergovernmental bodies, such as UNESCO and the OECD, working with various stakeholders and experts in the field have also produced frameworks against which QA agencies may be assessed.

Several organisations, active in the higher education sector, have produced position papers on issues related to quality in cross-border education; they also serve as guidelines for shaping QA developments in higher education. Examples are the 'Accra Declaration on GATS and the Internationalisation of Higher Education' in Africa' (2004) by the Association of African Universities; and the 'Sharing Quality Higher Education Across Borders: A Statement on Behalf of HEIs Worldwide' (2005) jointly prepared by the International Association of Universities (IAU), the Association of Universities and Colleges of Canada (AUCC), the American Council on Education (ACE), and Council for Higher Education Accreditation (CHEA).

While many frameworks have been developed, The Standards & Guidelines for QA in the European Higher Education Area (ESG) the INQAAHE GGP (described below) have frequently been taken as reference points for QA agencies seeking to demonstrate their quality. These frameworks are highlighted below.

Principles and Good Practices to Improve Quality

INQAAHE Guidelines of Good Practice (GGP)

Several agencies, including the National Commission for Accreditation (CNAP, Chile) and Higher Education & Training Awards Council (HETAC, Ireland), have undergone independent reviews against the GGP to demonstrate their own quality. The AUQA review also used the GGP.

Further support for the GGP comes from other groups concerned with QA. For example, in the Higher Education Policy Dialogue of in March 2008 organized by Australia, India, New Zealand and the UK, it emerged that successful QA systems have many common elements which are captured in the INQAAHE/GGP. A mapping of similarities across the QA agencies of Australia, New Zealand and UK, developed with input from representatives of these countries, was presented. Delegates from the other countries agreed that emerging QA systems need to consider the GGP as a guide to good practices, with particular relevance to less developed national systems. It was also agreed that most differences relate to national or regional contextual factors.

ENQA European Higher Education Area (ESG)

The Standards and Guidelines for QA in the European Higher Education Area (ESG)

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highlight these points as standards for EQA [QA] agencies:
- taking into account the presence and effectiveness of other EQA processes
- formal recognition of the EQA [QA] agency by competent public authorities
- undertaking EQA activities regularly
- having adequate and proportional resources
- clarity in goals and objectives
- independence of the agency
- having publicly available criteria based on the standard approach to EQA
- accountability procedures to ensure quality of the EQA [QA] agency

Source: The full set of principles is available on the INQAAHE website.

Periodic Review

In addition to gaining recognition by an umbrella organisation, agencies are aware of the benefits of meta-evaluation or "evaluating the evaluation itself" as a critical measure to ensure accountability and good practices. In the European region, the European Network of Quality Assurance (ENQA) requires member agencies to undergo an external evaluation every five years. Some agencies conduct impact studies and mid-term reviews to determine their progress toward the realization of objectives set within a strategic timeframe. Some agencies invite international experts to observe evaluation visits, participate in training programs and consultations, and to give feedback. The Higher Education Quality Committee (HEQC) of South Africa has an International Reference Group which acts as a sounding board for developmental plans.

Membership of Registers

The launch of the European QA Register for Higher Education (EQAR) in 2008 was a notable development in Europe with the goal of having all the QA agencies of the European region on a 'Register of external QA agencies operating in Europe'. The EQAR states that its aim is to increase transparency of QA, and thus enhance trust and confidence in European higher education. Its function is to list QA agencies that have proven their credibility and reliability in a review against the ESG.

To learn more about the role of EQAR in increasing transparency of quality assurance, visit the following website:

[EQAR: Standards and Guidelines for Quality Assurance in the European Higher Education Area](#)

EQAR: Standards and Guidelines for Quality Assurance in the European Higher Education Area

European Quality Assurance Register for Higher Education (EQAR) has been founded by the following European representative bodies of quality assurance agencies, students, universities and other higher education institutions, respectively.
- [European Network of Quality Assurance (ENQA)](#)
- [European Students' Union (ESU)](#)
- [European University Association (EUA)](#)
- [European Association of Institutions in Higher Education (EURASHE)](#)

The objective of EQAR is to increase the transparency of quality assurance in higher

education across Europe. EQAR will publish and manage a register of quality assurance agencies that substantially comply with the European Standards and Guidelines for Quality Assurance (ESG) to provide the public with clear and reliable information on quality assurance agencies operating in Europe. The register will be web-based and freely accessible.

The Register is expected to:

(i) promote student mobility by providing a basis for greater trust among higher education institutions;
(ii) reduce opportunities for "accreditation mills" to gain credibility;
(iii) provide a basis for governments to authorise higher education institutions to choose any agency from the Register, if that is compatible with national arrangements;
(iv) provide a means for higher education institutions to choose between different agencies, if that is compatible with national arrangements;
(v) serve as an instrument to improve the quality of agencies and to promote mutual trust among them.

EQAR was expected to be fully operational from summer 2008, with plans to publish a list of quality assurance agencies that comply substantially with the European Standards and Guidelines for Quality Assurance.

Criteria

All agencies which comply substantially with the European Standards and Guidelines (ESG) can be admitted to the Register. Substantial compliance determined through an external review by independent experts, and coordinated either by a national authority or another suitable organisation.

Full ENQA membership, also based on substantial compliance with the ESG, will normally constitute satisfactory evidence for inclusion in the Register.

Source: EQAR website

In 1999, when the International Association of University Presidents (IAUP) and INQAAHE proposed a 'Quality Label' that would identify credible QA agencies, there was opposition to the concept and consequently INQAAHE dropped the idea, which was clearly ahead of its time. Instead it developed the set of Guidelines of Good Practice (GGP), and it lists on its website agencies that have been independently verified as being in alignment with the GGP.

5. Discussion

Discussion: Objectives: Managing Stakeholder Relations and Ensuring Credibility

Consider the following questions:
1. How do the institutional and program accreditors in your country establish their credibility?
2. Analyse the direct and indirect accountability measures that operate in QA in your country.
3. Reflect on additional accountability measures that might work well for the QA agency in your national or regional context. Explain why you have identified

these particular measures and the shortcoming you consider needs to be addressed.

6. Summary

This topic covered the following main points:

- Quality agencies have many stakeholders. Meeting all their desires and needs is likely to be impossible, and even liaising with all stakeholders is very time-consuming, but is worth addressing to the extent possible.
- The credibility of the QA process is demonstrated through a combination of many factors and strategies, including the following:
  - o transparency and clarity in all policies;
  - o the appropriateness of the quality assurance framework;
  - o the integrity of the people involved;
  - o the desired impact on the HEI system;
  - o broad involvement of HEIs in helping the norms and criteria to evolve;
  - o consensus building to ensure widespread on-going support;
  - o careful development of the methods and instruments for assessment;
  - o rigorous implementation of procedures; and
  - o safeguards to enhance the professionalism of assessment.

  The way these strategies are combined and used will vary from situation to situation.
- The ownership of the QA agency has implications for accountability of the agency, but all are accountable to their owners and funders. Government-owned agencies often have government officials on board and also need to provide reports on their performance to the government. HEI-owned agencies are primarily accountable to HEIs, but must often also meet the expectations of government.
- The following are some varied ways in which accountability measures are implemented:
  - o Built-in checks in the functioning of the QA agency through periodic review
  - o Recognition from an umbrella organisation
  - o Reporting to stakeholders and the public
  - o Periodic review of agencies
  - o Registers of credible agencies
  - o Collaboration within networks with adherence to common principles and practices