



Working Paper  
2020:7

# Innovative practices in higher education quality assurance

A study of new activities, tasks and roles in six quality assurance agencies in Europe

---

Mari Elken & Bjørn Stensaker

NIFU



Working Paper  
2020:7

# **Innovative practices in higher education quality assurance**

A study of new activities, tasks and roles in six quality  
assurance agencies in Europe



Mari Elken & Bjørn Stensaker

Working paper 2020:7

Published by Nordic Institute for Studies in Innovation, Research and Education  
Adresse P.O. Box 2815 Tøyen, N-0608 Oslo.  
Visiting Address: Økernveien 9, N-0653 Oslo.

Project No. 21123

Customer NOKUT  
Address PB 578, 1227 Lysaker, Norway

Photomontage NIFU

ISBN 978-82-327-0492-7

ISSN 1894-8200 (online)



Copyright NIFU: CC BY 4.0

[www.nifu.no](http://www.nifu.no)

# Preface

The main purpose of this project is to explore both recent developments and possible future trajectories for quality assurance. This project has been commissioned and funded by NOKUT.

The project has been carried out by Mari Elken and Bjørn Stensaker from NIFU as the core project researchers. Thea Eide has been a research assistant in the project and compiled data for the mapping and background data for the case analysis.

We would like to thank all the informants who took the time to talk to us, share their reflections, and inform the analysis.

Oslo, 8th of December 2020

Vibeke Opheim  
Director

Nicoline Frølich  
Head of Research



# Innhold

<b>Summary</b> .....	<b>7</b>
<b>1 Introduction</b> .....	<b>9</b>
1.1 Background for the project.....	9
1.2 Methodology .....	10
<b>2 State-of-the-art: empirical and conceptual background</b> .....	<b>12</b>
2.1 Key trends in external quality assurance in Europe.....	12
2.2 Conceptual underpinning of the project .....	15
2.2.1 Agency drift—new tasks and responsibilities.....	16
2.2.2 International collaboration and dependency—extended field of operation .....	17
<b>3 New fields and new tasks for QA agencies</b> .....	<b>19</b>
3.1 Brief presentation of the six agencies .....	19
3.1.1 A3ES—a strong research unit .....	19
3.1.2 Evalag—considerable engagement with consultancy tasks.....	21
3.1.3 FINEEC—cross-sectoral quality assurance tasks.....	22
3.1.4 NVAO—reimagining assessment and cross-border agency work.....	24
3.1.5 QQI—more dialogue and additional regulative tasks .....	26
3.1.6 UKÄ—expanding into quality assurance of research.....	27
3.2 How do agencies manage new tasks and new fields? .....	29
3.2.1 Overall developments at the six agencies.....	29
3.2.2 Transforming quality assurance, and finding new tasks and fields.....	31
3.2.3 Future outlook.....	33
<b>4 Incrementalism, innovation or transformation?</b> .....	<b>34</b>
<b>References</b> .....	<b>37</b>



# Summary

## External quality assurance – beyond the established practice

Quality assurance is a well-established practice in most European countries, and there are now good arguments to consider external quality assurance in higher education a matured task. Over time, many quality assurance agencies in Europe have also obtained additional tasks than those that concern external quality assurance. The purpose of the current study is twofold: a) to identify and typologise the variety of new tasks within quality assurance agencies and b) to study how such tasks have been developed, the consequences these have had this far and how they may impact practices of quality assurance in the future. Thus, the analysis has an explorative emphasis – hinting at what the future might imply for European quality assurance agencies.

The report is based on an analysis of six quality assurance agencies in Europe: A3ES (Portugal), evalag (Germany), FINEEC (Finland), NVAO (The Netherlands/Flanders), QQI (Ireland) and UKÄ (Sweden) – covering a range of countries and contexts. The six agencies were purposefully selected to examine how new tasks emerge and how these may affect the future of external quality assurance.

## Key findings and implications

The study finds that despite increased emphasis on international developments, the agencies analysed in the present study show a strong national orientation; they are still under substantial control of and influenced by national authorities – often resulting in new tasks and responsibilities for the agencies.

The six agencies show engagement with new fields (focusing on other levels of education, some degree of cross-border quality assurance) and new tasks (consultancy, research tasks), as well as the reorientation of regular quality assurance approaches (e.g., removal of standards from assessments). Some have also obtained additional regulative tasks. Older tasks and established responsibilities do not disappear though, and the study identifies an expanding number of tasks and territories agencies are entering into.

This suggests that the trajectories and pathways for quality assurance agencies in Europe remain highly diverse. Although some agencies have either received or themselves initiated new tasks/fields, there is also another trend in that agencies have been subject to various merger processes, where more traditional and narrow QA agencies have been merged with other public agencies who have adjacent or similar tasks. A possible implication of the study is a possible growing tension between the domestic and European roles and responsibilities of quality assurance agencies.

# 1 Introduction

## 1.1 Background for the project

Quality assurance is a well-established practice in most European countries, and there are now good arguments to consider external quality assurance in higher education as a matured task. This has resulted in the establishment of internal quality assurance systems in institutions (Brennan & Shah, 2000); arguably, this has also had consequences for how institutions work with quality (Stensaker, Langfeldt, Harvey, Huisman, & Westerheijden, 2010). Yet questions have been raised whether the kind of quality assurance models that are promoted in Europe have this far been focused more on control and minimum standards instead of quality enhancement (Huisman & Westerheijden, 2010).

Although there has been substantial development in quality assurance, both a range of similarities and differences can be observed. A key similarity seems to be a trend towards more institutional accreditation (or audit) processes and an emphasis on cross-border education. Nevertheless, national variations vary, and agencies across Europe also have considerable variation in their tasks and mandates (Hopbach & Fliermann, 2020). Many agencies have obtained additional tasks other than those concerning the management of external quality assurance. Such tasks can also be important for agencies to maintain their position and legitimacy within their own national system and in an increasingly international landscape of quality assurance.

To examine what kind of new practices quality assurance agencies have developed can inform the development of quality assurance in the future. Therefore, the purpose of the present study is twofold: a) *to identify and typologise the variety of new tasks within quality assurance agencies* and b) *to study how such tasks have been developed, the consequences these have had so far and how they may impact practices in the future*. In other words, when preparing for the next generation of quality assurance in Europe, what might this look like?

## 1.2 Methodology

The current project was conducted in several stages. We started the analysis by conducting a broad mapping of QA agencies in Europe to explore more general patterns in the mandates and task expansion in Europe. This mapping informed the selection of cases that would represent the various ways to conceptualise new tasks and responsibilities at QA agencies. The selection was further informed by consultations with various experts in the area of quality assurance who had a broad overview of the developments in Europe.

In total, six cases were selected for the analysis: A3ES in Portugal, evalag in Germany, FINEEC in Finland, NVAO in the Netherlands, QQI in Ireland and UKÄ in Sweden. For the case analysis, we used desk research to review the available documents and information about the agencies and conducted a limited number of interviews in each agency (two to four per agency, in total 17 interviews)—with key informants who hold key positions and/or have long organisational memory. Most of the interviews lasted about 45 minutes, some up to an hour. The topics included recent developments at the agency, how the external environment and their internal practices had changed in recent years, how and why new tasks had been developed and how they viewed the future development of their agency and of quality assurance in Europe. The interviews were conducted and recorded digitally and transcribed by a research assistant. Because the number of interviews in each agency is comparatively limited and we do identify specific agencies, we use the interview data in an aggregated manner to safeguard our informants' anonymity.

In addition to the interviews, where possible, we have also built on document information concerning the specific tasks we have examined. The specific set of documents for each agency varies somewhat because some of the tasks we have explored are relatively established, whereas others are in the form of a pilot. In general terms, the document data include, for example, presentations, reports, evaluations and so forth. In addition, we have also examined considerable secondary data; for example, we have also looked into the self-evaluation reports prepared for the ENQA agency reviews, particularly what the agencies have emphasised in their SWOT analysis. These data have primarily been extracted from agency websites.

In total, both the descriptive case descriptions and cross-case analysis build both on interview data and document data in a cumulative and summative manner.

## Structure of this working paper

In Chapter 2, we present a general empirical and conceptual background for this working paper. First, we explore current main trends in quality assurance in Europe. Second, we present the conceptual starting point for this report.

In Chapter 3, we present the empirical insights developed in the present project, with a particular focus on the six cases examined. We first present the six cases and the development of new tasks and then discuss more analytically the conditions under which specific kinds of tasks emerge and how this is related to regular QA tasks at the agencies.

In Chapter 4, we provide concluding comments and suggestions for future development.

## 2 State-of-the-art: empirical and conceptual background

In this chapter, we provide a brief introduction to the background of this project. First, we provide a broad overview of the main trends in external quality assurance in Europe. Second, we present our conceptual starting point for exploring task expansion and innovation at quality assurance agencies.

### 2.1 Key trends in external quality assurance in Europe

During the past two decades, European higher education has seen a dramatic change following the introduction of the Bologna process in the early 2000s (Kehm, Huisman, & Stensaker, 2009). Through the Bologna process, a number of European countries agreed to harmonise their higher education systems through changes in degree structures, credit systems and not least, in building up external quality assurance as a way to ensure transparency while also upholding academic standards (Westerheijden, Stensaker, & Rosa, 2007). The result is that external quality assurance has become one of the most visible activities driving European integration in higher education. However, we should be careful in describing changes as only being driven by European processes in a top-down manner. Because higher education systems in Europe are highly diverse and still under national jurisdiction, there are considerable national dynamics that are sometimes compatible with and sometimes clash with broader European developments (Hopbach & Flierman 2020).

At the national level, external quality assurance has played quite diverse roles in reform attempts—sometimes strengthening public regulation of the higher education sector while at other times supporting the political ambitions of increased university autonomy in more deregulated and more market-driven systems (Dill & Beerkens, 2010; Westerheijden, 2001). As part of this process, governments have set up their own national external quality assurance systems, and new national agencies have emerged with a range of tasks and responsibilities (Brennan & Shah, 2000; Gornitzka & Stensaker, 2014). In the early 2000s, the OECD mapped

the most important of these tasks and responsibilities (Kis, 2005), demonstrating that quality assurance agencies:

- Controlled quality and had important tasks in regulating providers of higher education
- Facilitated quality improvement processes
- Were responsible for accountability towards national parliaments
- Were part of national governance frameworks (Ministerial steering/planning of higher education)
- Supported more self-regulated higher education institutions
- Stimulated internationalisation of the higher education sector
- Provided information to students and employers

Later mappings of quality assurance agencies throughout Europe have demonstrated that a great deal of diversity still exists and that new tasks have even been added to the ones listed above (ENQA, 2008, 2012, 2015). These mappings also report agencies almost being in a constant state of reorganisation and very exposed to swings in political preferences following national elections and shifts of governments (Westerheijden, Stensaker, Rosa, & Corbett, 2014). New tasks and responsibilities may be rapidly added, transformed or even removed as a result of such events.

This situation provides a somewhat ambiguous picture of quality assurance as a phenomenon and of the problems and possibilities facing quality assurance agencies (Karakhanyan & Stensaker, 2020). On the one hand, external quality assurance is one of the greatest successes of the entire Bologna process; the establishment of this activity at the national and European levels, the development of European Standards and Guidelines and the interest given to issues related to quality throughout Europe hints at an activity seen as important—both politically and academically. It is an activity that is now sometimes characterised as a mature activity and a taken-for-granted part of higher education governance arrangements. On the other hand, the constant transformations and shifts in tasks and responsibilities also signal an area that is very exposed to political opportunism and that is intertwined with the global changes taking place in higher education. The latter is, from an agency perspective, a situation that creates uncertainty about how to plan for the future and the available strategic options.

The uncertainty facing quality assurance agencies stems from several sources. Questions are raised regarding whether the models of quality assurance promoted in Europe emphasise compliance and bureaucratisation at the expense of enhancement (Huisman & Westerheijden, 2010). Changing national policy priorities, increased competition in how quality can be evaluated and technological and methodological advancements all pose new challenges to quality assurance

(Hopbach & Fliermann, 2020). To start with the latter, one could argue that the standardisation of methods and refining them over time is a key trademark for European quality assurance and for the agencies located in this part of the world. These methodological advancements have still not hindered governments in introducing new ways to secure and develop quality in a sector where qualification frameworks and student learning outcomes are among the most important elements (Coates, 2014). Although qualification frameworks and learning outcomes indeed can be integrated into existing ways of evaluating quality, they could also be seen as a competing way of assuring quality, downplaying the process-oriented perspective that has characterised European quality assurance and driving a more outcome-oriented approach. Therefore, it is possible to argue that this development represents a critique of the ways and means of conducting quality assurance. Whether the learning outcomes agenda will change quality assurance is yet to be seen—although it signals a need for the sector to critically examine their own approaches and strengthen innovation (see, e.g. Eaton, 2018 for a discussion on the role of quality assurance in combating academic corruption). Given the latest interest in student learning, one can imagine that this need for innovation will only be pushed further in the years to come.

As higher education in a number of countries has continued to expand regarding student numbers, national governments are increasingly attentive to how expenses can be controlled and how to make the sector more efficient and effective. Quality assurance has not escaped this agenda, and the introduction of ‘risk-based’ approaches in various countries (Karakhanyan & Stensaker, 2020) is perhaps an example of the interest in adjusting and creating lighter and smoother approaches, in this manner also catering to the critique of quality assurance becoming too bureaucratic an endeavour. The rise of national student surveys, national reporting systems and new expectations directed at higher education institutions should inform the public about their performances are examples of initiatives taken in various countries that are intended to supplement and perhaps scale back the need for comprehensive external quality assurance processes in the ways they have been conducted in the past.

A key question for these processes of change is how such changes are mandated and managed. Although agencies enjoy considerable autonomy regarding the ways they may interpret their mandate, many governments have still created rules and regulations that provide them with substantial influence over agency activities. Not least, many quality assurance agencies receive their funding from public sources. For many national governments, quality assurance agencies are increasingly seen as an integrated part of their governance arrangements, where optimising the uses of available resources, time and energy in dealing with various political issues often drives the political agenda (Dill & Beerkens, 2010). Yet these

practices also vary considerably across countries. Even though the Standards and guidelines for quality assurance in the European Higher Education Area (ESG) have set certain standards for quality assurance procedures, the European framework still leaves national governments with much leeway as to how they want to translate the ESG domestically.

The field of quality assurance in Europe should not take for granted that external quality assurance will continue to be a public responsibility. In many parts of the world, external quality assurance is organised differently, either where real autonomous agencies have been set up to conduct this activity or where private actors have been given a key role (Karakhanyan & Stensaker, 2020). In Europe, the public ownership of quality assurance and the public engagement in this activity is still dominant, but also in this part of the world, higher education has been invaded by various rankings and scorecard exercises which—although not comparable to traditional quality assurance—may be seen as a competitor in assessing quality and providing the public’s information about quality in higher education. In countries experiencing shifts in policy preferences that emphasise the urgent need to reduce public spending, this can pave the way for increased ‘user involvement’, or demonstrating political potency; the result can be dramatic for any given agency (Westerheijden et al., 2014).

The current situation invites a rethinking of the long-term future for quality assurance in Europe. This concerns the kind of position QA agencies have in the governance arrangements and the kind of tasks these agencies would take up. First, would agencies become more integrated into the public governance of higher education, or would we see a development where public agencies are transformed into becoming private foundations or self-owned organisations? Given the latter, are we heading for a situation when national agencies are increasingly operating in a cross-border manner, hence merging over national borders, sharing resources or forming alliances? Similarly, should one expect that quality assurance tasks primarily remain in the domain of quality assurance, transforming the core activity to better suit sectoral needs, or can we also expect that agencies would diversify their portfolios and increasingly integrate quality assurance with new tasks that in various ways address the issue of quality?

## **2.2 Conceptual underpinning of the project**

The current project aims to explore how quality assurance currently transforming – here in the hopes that a look into experiments, innovative practices and new approaches may shed light on the possibilities and roles that are open for European quality assurance agencies. Because the project is explorative, our aim has not been to predefine the specific activities and tasks a given agency might undertake

but rather to assist in the systematic thinking that quality assurance agencies are engaged in regarding strategic development and future positioning.

To inform such thinking, we base the conceptual framework on knowledge and research stemming from the agencification that has taken place in many European countries over the past decades and on the assumption that the European (and global) dimension will still be an important point of reference for national governments—also in the years to come. On the one hand, we focus the notion of ‘agency drift’, emphasising how agencies may take up new tasks and responsibilities, and on the other hand, we examine the extended field of operation for European quality assurance agencies.

### **2.2.1 Agency drift—new tasks and responsibilities**

Establishing an agency is normally about transferring governmental activities vertically to more specialised organisations (Trondal, 2014). This is a development that has taken place in a number of societal sectors, including higher education. However, transferring responsibilities to agencies can take place in different ways. First, it is possible to identify what we could label as vertical specialisation, where tasks are delegated from ministries and transferred to relatively independent agencies positioned with some distance from direct political and ministerial influence. Second, it is also possible to identify horizontal specialisation within a given sector, where agencies are differentiated according to various ministerial tasks (Christensen & Lægheid, 2006). In higher education, the latter may refer to establishing various public agencies with specific mandates for undertaking quality control, enhancement, funding of research, handling of internationalisation and so forth. Hence, for quality assurance agencies, there might be ‘competing’ public agencies that may have partially similar and/or overlapping tasks and responsibilities. This can both be regarded as a threat but also implies opportunities from a strategic perspective. Thus, agency drift refers to agencies taking up new tasks, roles and responsibilities that refine, redefine or extend original mandates. This is a result of agencies being (partially) autonomous and having the capacity for action.

In Europe, interesting developments have also taken place when national agencies have travelled abroad and formed new umbrella organisations—sometimes labelled meta-organisations (Ahrne & Brunsson, 2008). Thatcher and Coen (2008) have suggested that such organisations have gradually developed stronger ties and strengthened their influence—not least as they are seen as legitimate and important actors by the European Commission (Levi-Faur, 2011). For national agencies, this can further strengthen agency drift because their definition of tasks and responsibilities no longer is only attached to the national context but is

increasingly also shaped by European processes. Assuming that agencies have self-interest in long-term survival, the situation above provides another possibility for agency drift.

Given the above, agency drift may be related to both agencies' increasing international orientation and to the extending scope of their domestic operations.

### **2.2.2 International collaboration and dependency—extended field of operation**

The national agencies operating in Europe have a long tradition of collaboration, not least demonstrated by the existence of ENQA and the role this membership organisation has played in professionalising quality assurance over the years. In Europe, external quality assurance is also more formally regulated, and the European Register (EQAR) ensures that agencies operating in Europe will adhere to the standards and guidelines for quality assurance in the European Higher Education Area (the ESG). Most agencies also engage in international activities, which primarily concern quality assurance tasks (ENQA, 2015). Hence, there is a long-standing collaboration among agencies in Europe and European legal dependencies regarding their operations.

However, the national higher education systems in Europe are still maintaining distinct national characteristics, even in the field of quality assurance. This implies that quality assurance agencies have different maturity some are younger, and some have considerable experience in the quality assurance area (ENQA, 2015). Furthermore, the national characteristics also influence the degree of autonomy given to the agencies at the national level and the tasks and trust they enjoy.

Therefore, it is safe to argue that there is a considerable 'stretch' among the European quality assurance agencies if we look at their size, age, tasks and responsibilities. The European dimension ensured by ESG and EQAR drives standardisation in the field, opening up for the paradox that we may see more standardisation and more diversity emerging simultaneously. This situation may open up strategic options where some agencies could become more specialised and occupy certain niches in the field (Stensaker, 2018).

In strategic terms, the choice between expansion and concentration is a classical one, but it is still a dichotomy that may be relevant to the field of quality assurance—even though we are well aware of the fact that the autonomy for some agencies to make such choices is quite limited, we would still argue that the simple table below could be fruitful when initiating strategic discussions.

**Table 1: Strategic options for external quality assurance agencies<sup>1</sup>**

	Existing tasks	New tasks
Existing fields		
New fields		

In Table 1, the existing tasks can be seen to correspond to traditional QA tasks at agencies—which may be reshaped, refined and altered—but they nevertheless imply that agencies remain within what is now labelled as quality assurance and merely refine the approach to quality assurance. These tasks can arguably take place both within an existing field, that is, in the national higher education context the agency is traditionally located in. Or these tasks can also be extended to new fields, suggesting both broader and more narrow trajectories, for example, a much more open and cross-national field of QA operation or that agencies provide QA tasks beyond what is traditionally the higher education domain. Similarly, new tasks imply that to a larger extent, agencies would take up additional responsibilities. Some examples of this could be consultancy or research, which could be related to QA tasks but represent distinctly different responsibilities. Such new tasks can be undertaken in an existing field/domain or in new ones.

---

<sup>1</sup> The table is inspired by standard product/market matrixes, but in quality assurance, we think that ‘fields’ is a better label than ‘markets’ because QA agencies might potentially serve a diverse set of stakeholders—both commercial and non-commercial. We have also chosen the term ‘tasks’ instead of products because most QA agencies are delivering both material and immaterial services.

## 3 New fields and new tasks for QA agencies

In this chapter, we present the empirical analysis conducted in the project. We first briefly present the six agencies that have been analysed. After this, we discuss the development of new tasks from a more aggregated perspective: what the key factors are for such tasks to emerge and how these emerging patterns could be explained.

### 3.1 Brief presentation of the six agencies

In the following, we will briefly present the six agencies and how new tasks and engagement with new fields have been developed at the agencies.

#### 3.1.1 A3ES—a strong research unit

A3ES in Portugal was established in 2009. The first few years were used to construct the organisation, and in 2012, the first regular cycle of accreditations began. Initially, the agency carried out study programme accreditations. Starting from 2017/2018, A3ES also carries out institutional assessments. The agency has substantial formal autonomy—it operates as a ‘private law foundation established for an indeterminate time’. Initially, A3ES received initial funding from the ministry to set up the agency but has been financially self-sustaining since. Most of its funding comes from fees from services provided and grants. The quality assurance tasks at the agency are managed by staff of about 20–30 employees. As such, the agency is relatively small, but its size has also been quite stable over time. It is both a member of EQAR and ENQA, most recently going through an ENQA evaluation in 2019.

Its main quality assurance tasks were initially connected to the necessity to have control over a large number of study programmes that were of a very low quality. This also took considerable time and resources from the agency. After the first cycle, there has been a gradual development in accreditation procedures

towards introducing more risk-based elements. This means that since 2017/2018, the institutions that had a good track record from the first evaluation cycle could apply for a 'light touch' approach. To be eligible for this, the institutions need to have a certified internal quality assurance system, which they can voluntarily apply for. Overall, this suggests that the quality assurance procedures have become somewhat more differentiated. Nevertheless, at the moment, there are no considerable discussions to move away entirely from programme accreditations because these have an important accountability function.

In addition to the activities in Portugal, A3ES has also taken up quality assurance-related tasks in Angola, Macau, Mozambique and Sao Tome and Principe. Nevertheless, international endeavours at this point remain somewhat limited in scope and are not considered the core focus for the agency.

The agency has had a relatively proactive digitalisation approach, where data from the quality assurance processes are collected in a broad database. This database not only enhances the efficiency and effectiveness of agency operations, but also serves as a basis for analysis and research.

In addition to a number of regular QA tasks, A3ES also has a separate Office of Research and Analysis that engages in higher education research. This unit was established at the time of establishing the agency because research and analysis was termed an integral component of the agency's work. The management board of the agency has many persons with an academic background, likely strengthening the emphasis on viewing research as a task for the QA agency to engage in. The main purpose of the unit was to provide a relevant knowledge base for the development of quality assurance.

The unit is composed of four researchers, which has remained at a stable number over time. The research tasks in the unit include research that utilises the data from the agency and covers themes of direct relevance to the evaluations conducted (e.g., looking into system impact), but it also includes themes of more indirect relevance that contribute to knowledge of quality in Portuguese higher education. As such, the researchers both pursue agency-relevant tasks and can also take up topics that they identify as potentially relevant. A3ES also participates in various international collaborative projects, for example, those funded by Erasmus+ or other international sources. Although some research includes external funding, other research activities can be entirely self-funded. Some research also utilises the digital database that A3ES has been developing. In general, there is a broad view on quality enhancement, which also implies a rather broad research profile.

Although the agency is located in Lisbon, the research unit is located together with CIPES (Centre for Research in Higher Education Policies), which is a higher education research unit founded by universities in Aveiro and Porto and also

includes other higher education institutions in Portugal. As such, the researchers from the agency work closely with CIPES and vice versa. This further strengthens the research environment at A3ES because the two centres also have well-established practices for collaboration. The collaboration between CIPES and A3ES has contributed to an international orientation as well, where the research unit has taken part in several projects with a European dimension.

### **3.1.2 Evalag—considerable engagement with consultancy tasks**

Evalag was established in 2000 as a foundation under public law. It is one of 10 quality assurance agencies that operate in Germany<sup>2</sup> with its main emphasis being on Baden-Württemberg. In many ways, evalag is not a typical agency in Germany, with its broad spectrum of activities being one of its unique characteristics. Evalag was established as a quality assurance agency, but in the beginning, it did not carry out accreditation processes, only evaluations and audits. Its activities expanded in the mid/end-2000s to include other tasks, including accreditations. In 2009, evalag became licenced by the German Accreditation Council (Foundation for the Accreditation of Study Programmes in Germany). Evalag's funding comes primarily from two sources: a basic grant from the Ministry of Science, Research and the Arts Baden-Württemberg and fees collected from paid services. In addition, the agency also obtains some funding from competitive European sources, for example, from Erasmus+. The agency is relatively small—with a CEO, secretary, 14 employees and four persons for administration/IT. It is both a member of EQAR and ENQA.

In its current form, evalag has a number of quality assurance tasks, including regular accreditation tasks in Germany, international accreditations, audits and accreditations in Austria and Switzerland. Regular accreditation tasks take up about one-fifth or one-fourth of evalag's activities. Evalag also performs various kinds of external evaluations. In addition, they also have a consultancy-oriented arm that emphasises quality management and organisational development projects. Evalag regularly engages in evaluation/accreditation tasks internationally, both in Europe and beyond.<sup>3</sup>

The German accreditation system has also been changing over time—accreditation periods have expanded from five to eight years over time, and there is a clear move towards going from programme to institutional accreditation. This has also enhanced the competition between the various agencies, and this competition can be expected to be further increased in the coming years. Germany has also opened up for other EQAR-registered QA agencies to conduct accreditation

---

<sup>2</sup> Eight of them are German agencies, one from Austria and one from Switzerland

<sup>3</sup> Including Albania, Austria, Hungary, Kosovo, Kyrgyzstan, Lebanon, Liechtenstein, Lithuania, Russia and Switzerland

processes, potentially further intensifying competition. In the current procedure for accreditation, agencies carry out accreditation processes, but the final decision on accreditation is made by the German Accreditation Council.

As indicated, in addition to regular quality assurance tasks, evalag has considerable activities in the areas of both consultancy and research. This is also reflected in its internal structure—regular quality assurance tasks are located in one department, whereas there are separate departments for consultancy/evaluation/organisational development and science support by engaging in applied higher education research. There is a general policy that staff should be able to work in two fields, and as such, the internal organisation emphasises flexibility and cross-departmental cooperation.

The research and development projects evalag has been involved in often also have relevance for quality enhancement (e.g., indicator development or learning analytics). The department for research and development tasks was established about two years ago. The project portfolio contains a mix of themes that various stakeholders may find interesting, but the portfolio also reflects the research interest of the staff at evalag. Consultancy tasks and research projects are seen as mutually reinforcing and provide the agency with a European dimension—not least in relation to the Erasmus+ projects. The relationship is not always direct, but where relevant, insights from research and development are also used for consultancy.

Consultancy tasks primarily concern preparation for system accreditation. The thematic scope is also dependent on the competence profile within evalag; this consultancy task has gradually become a well-established task at evalag. Consultancy tasks include early discussions of developing quality management to help the institutions prepare for site visits. In addition to accreditation-related consultancy, Evalag also takes up consultancy projects concerning other relevant themes, for example, reporting systems, strategic work or organisational development.

### **3.1.3 FINEEC—cross-sectoral quality assurance tasks**

FINEEC (the Finnish Education Evaluation Centre) was initially founded in 1996 as FINHEEC, and it is the single quality assurance body in Finland. In 2014, there was a widespread merger process that combined the evaluation activities of FINHEEC, the Finnish Education Evaluation Council and the Finnish National Board of Education's Unit for Evaluation of Learning Outcomes into a single organisation: FINEEC. The merger was part of a larger wave of efficiency-related reforms in the public sector. FINEEC now operates as a separate unit within the Finnish National Agency for Education. It is labelled an independent expert operation while being a branch under the Ministry of Education and Culture. Its autonomy is

safeguarded by the law, which has remained true after the merger process. Most of FINEEC's funding comes directly from the state budget to FINEEC, even if it is formally part of the Board of Education.

FINEEC is a member of ENQA and EQAR and most recently went through an ENQA review in 2016.

The overall number of staff in the whole centre is about 40–50 individuals, about 10–12 of whom are doing evaluations of higher education. There is a general emphasis on having a small, lean and effective organisation. Even after the merger process incorporated FINEEC into a larger structure, there is still an ongoing question on what this entails in practice, for example, in terms of standardisation of internal administrative/support procedures.

The higher education quality assurance system in Finland has gone through a range of changes in recent decades and is described as primarily enhancement oriented. Initially, quality assurance was conducted through institutional evaluations in the university sector (1992–2004). From 2005 onwards, three rounds of audits have been started (the third one is currently underway).<sup>4</sup> In the universities of applied sciences sector, the role of the agency was to carry out evaluations to grant operating licences. There are some concerns in the sector concerning the added value of new audits if no changes are made to the system of quality assurance in higher education. However, in the three rounds thus far, there has also been a continuous development of the audit approach, and as such, a gradual incremental development has been observed.

As a result of the merger in 2014, FINEEC's evaluative tasks now cover all educational levels—from early childhood education to higher education. Currently, FINEEC is organised in three distinct units—higher education and liberal adult education, vocational education and one for general education and early childhood education. In particular, in early childhood education, evaluations are a more novel idea. To some extent, evaluation procedures from higher education have inspired the development of QA for other levels of education. Each of the units has tasks within their own sectors, but there are also examples of cross-sectoral evaluation projects with a specific theme, and after the merger, issues related to transfer between educational levels are also on the agenda. As an example of a cross-sectoral project, an evaluation of entrepreneurship in both higher and vocational education was recently carried out. In this project, personnel from both higher education and vocational education units would work together to develop an evaluation scheme. At the moment, work is still ongoing in obtaining full synergy from the merger process, but there are positive reports on viewing education as an overall lifelong trajectory rather than a single sector endeavour.

---

<sup>4</sup> It should be noted that the Finnish audits since the first cycle have also included questions on the quality assurance of research and regional development.

In addition to regular quality assurance, FINEEC can also engage in activities that demand a fee, but at this point within the higher education sector, these are comparatively limited.<sup>5</sup> For example, FINEEC also conducts engineering programme accreditations (for the EUR-ACE label), and there is a discussion concerning possible accreditations for the World Federation of Medical Education. Both of these represent fee-based services.

FINEEC has engaged in some examples of cross-border evaluation activities but on a small scale at this point. Although there is an interest in engaging in some degree of international evaluations, at this point, this has been limited. However, FINEEC has engaged in some Twinning projects<sup>6</sup> that also represent international activity and outlooks.

### **3.1.4 NVAO—reimagining assessment and cross-border agency work**

NVAO is organised as a cross-border agency, which in itself is a rather unique feature in European quality assurance. Its main mandate is to work with quality assurance, encourage improvement and promote a quality culture. Given its cross-border nature, NVAO is organised in separate units for the Netherlands and Flanders. NVAO has about 30 FTE of staff for quality assurance (about 40 in total), with about two-thirds working on the Dutch side of NVAO. NVAO is funded by the Dutch and Flemish government and by the fees collected. NVAO is a member of both ENQA and EQAR.

The quality assurance system in the Netherlands and Flanders builds on a quality assurance approach that was developed in the mid-1980s and further refined in the 1990s. When NVAO was founded in 2003 (acquired legal status in 2005), it largely built on those experiences. The first pilots for audits started in 2009, with a subsequent discussion on how the quality assessment system would be developed further. The two systems had somewhat similar principles. In the Netherlands, since 2011–2012, there have been institutional audits and programme accreditations, but the latter are a bit ‘light touch’ if there is a positive result from the audit. Flanders adopted a similar approach from 2014–2015, where institutional reviews examined the educational policies of the institutions, and these were combined with programme accreditation. Since then, the Flemish and Dutch systems have gone down somewhat different paths.

Although in the Flemish system the ‘appreciative approach’ has been introduced, the Dutch system has kept its core quality assurance tasks in place with both audits and programme accreditation, instead obtaining additional new tasks beyond quality assurance. Among others in the Netherlands, NVAO carried in

---

<sup>5</sup> There are other fee-based tasks for other educational levels.

<sup>6</sup> These would arguably represent a form of consultation but for an international audience.

2019–2020 out an assessment of the quality agreements between institutions and individual higher education institutions.<sup>7</sup> Based on this assessment, institutions allocate study advance funds for the development of educational quality. One of the criteria for NVAO to take up this task was to organise these assessments in accordance with the ESG. Concerning regular quality assurance tasks, there has been a discussion to move towards audits because the study programme as a unit has occasionally come into question (e.g., emergence of modularised studies, etc.). In this line of thinking, programme evaluations would be carried out by the institutions themselves rather than lead to accreditation. The discussion on this is ongoing.

The appreciative system in Flanders was introduced as a direct response to the policy review approach from 2014–2015. The review was comprehensive and came on top of existing programme accreditations. This was met with strong opposition from the sector, resulting in a public debate about future quality assurance procedures. Following this, a task force was established in 2016–2017. During this, NVAO took a proactive approach and approached the task force with a preprepared suggestion and gained support from all core stakeholders. In 2018, the new legislation was established, and in autumn 2019, the new quality assurance system began.

What has been labelled the ‘appreciative approach’ was a means to signal an entirely new quality assurance regime. A stated core principle for the approach is to move away from a standard- and compliance-based approach. On the website, it is titled a ‘philosophy and a mindset’, with a core emphasis on the fact that all evaluations are contextual and that they should take place through dialogue. An underlying rationale for the approach is that when quality assurance systems emphasise specific standards, institutions tend to work towards these rather than critically discuss and enhance their own quality. Thus, instead of using standards, the approach is based on a set of questions the panels work with. This also means that the evaluation panel reports no longer follow predetermined templates. Nevertheless, the institutions still write a self-evaluation report where the institutions can present themselves, but the maximum allowed size is limited, and any additional material should refer to existing documentation available on websites already. More recently, the emerging question is whether the evaluations could also be expanded to research and innovation tasks and what such a system would look like. Although the approach emphasises dialogue and advice, there is also clarity of this not being a consultative role.

---

<sup>7</sup> Quality agreements replaced the earlier performance agreements; they cover educational objectives and are used to reallocate a share of funding to develop educational quality (see Jongbloed & de Boer 2020).

Overall, from a rather similar starting point, NVAOs' two national branches have become more diverse over time. Although NVAO Netherlands has a strong emphasis on accreditation, NVAO Flanders seems to have obtained a more dialogue-oriented role.

NVAO already functions as a cross-border agency and also has some international activities—most prominently programme accreditations in 'Caribbean Netherlands' and programme assessments in Curacao, Aruba and St. Maarten.

### **3.1.5 QQI—more dialogue and additional regulative tasks**

Quality and Qualifications Ireland was established in 2012 when four agencies merged: Further Education and Training Awards Council, the Higher Education and Training Awards Council, the National Qualifications Authority of Ireland and the Irish Universities Quality Board. QQI is a relatively large organisation, employing about 75 FTEs across the main organisational units. QQI has responsibility for quality assurance tasks, but it also manages the national qualifications framework in Ireland (NFQ—Irish National Framework of Qualifications) and tasks related to recognition and international education. In addition to these tasks, QQI also engages in development projects both within Ireland and beyond. QQI operates as an independent state agency. About one-third of QQI's budget comes from the Department of Education and Skills and from grant-in-aid. In addition to this, QQI also receives a range of fees and charges.

The Irish educational market is open to new providers, which has consequences for QQI's role. QQI covers all postsecondary education. Established institutions (universities and a few specialised institutions) undergo a periodic comprehensive institutional review that covers education, research and services. The institutes of technology undergo a similar review, but they also need QQI approval to award degrees. The third category comprises institutions that need QQI to award their degrees—they need to go through both a review and need validating of their programmes at regular intervals.

In recent years, QQI has both obtained new tasks but also worked on emphasising a stronger dialogue-based approach with the sector and stakeholders. Among other things, three new tasks can be identified. First, QQI has now obtained a stronger regulative function concerning the private sector. This function entails that QQI also has mandated exploring the financial viability of private institutions, including whether they operate in compliance with existing legal frameworks. In other words, QQI has obtained a clear regulative function for the private sector, in addition to the usual quality assurance tasks. For the public sector, a similar regulative task is performed by the Higher Education Authority, which also provides funding for the public sector. Second, QQI has obtained new tasks concerning

international education and online education, where QQI assesses whether providers act in compliance with established codes for practice. This also includes transnational education provided by Irish institutions together with international institutions. Third, QQI also has obtained the responsibilities to work with hindering academic misconduct and contract cheating, prosecuting those who, for example, sell services for writing essays and student papers. Although new tasks have been added, some of the existing QQI tasks have also been transformed or reduced in scale. For instance, the scale of the type of institutions that need to go through programme evaluations has been reduced. Thus, although some tasks imply a stronger new regulative role, there is also a gradual transformation of the QQI portfolio of tasks.

Concerning QQIs' contact with the sector and stakeholders, there is a strong emphasis on strategic dialogue. The sector dialogue was inspired by the Scottish system and benefits of having a small higher education system. In principle, this means that QQI leadership has dialogue meetings with institutional representatives; these dialogue meetings supplement the annual quality reports in which institutions describe their internal quality systems and compliance with the ESGs. The dialogue also allows the uptake of new and innovative themes or the identification of good practices. Based on the annual reports, QQI also develops an analysis of key trends in the system and follows up on identified issues, sometimes taking the role of a facilitator enhancing institutional learning across the sector. In addition to this, QQI has also adopted a stronger dialogue with other stakeholders—including the sector—but also actors such as funding agencies, student organisations and professional bodies, among others. This stakeholder engagement is perceived as important to both communicate QQI's role and function in the system and to achieve the broader impact of quality assurance. A stronger emphasis on stakeholder engagement is also a part of QQI's new strategy and is now embedded in a separate unit for stakeholder engagement and communication.

Thus, QQI has evolved in two directions: obtaining a more regulative role by taking up new tasks and strengthening its soft approach facilitator role, where dialogue and engagement are in focus.

### **3.1.6 UKÄ—expanding into quality assurance of research**

The Swedish Higher Education Authority (UKÄ) was established in 2013. Until then, quality assurance tasks had been carried out by the Swedish National Agency for Higher Education, which had been in operation since 1995. UKÄ operates as an independent government agency. UKÄ receives its funding from public sources through a yearly public service agreement. Although there is a legal mandate for its operations that identifies its responsibilities and tasks, UKÄ is independent to

make decisions. However, the government may also assign/delegate new tasks, which are referred to as 'government assignments'.

UKÄ is currently undergoing an ENQA review for membership and applying for EQAR registration. The predecessor for UKÄ was a member of ENQA between 2000 and 2012. Since 2014, UKÄ has been an affiliate of ENQA but not a full member.

UKÄ is a comparatively large agency, with about 90 employees who work in three departments for analysis, legal affairs and quality assurance. These three departments also reflect UKÄ's three main tasks: quality assurance in higher education; assurance that the higher education sector complies with laws and regulations; and statistics, analysis and follow-up of higher education. Internally, there are ongoing discussions about how statistics and data could be coupled to and exploited in relation to the other activities conducted by the agency.

In 2013, when UKÄ was established, the development of the new quality assurance system began. The new cycle lasts from 2017–2022. In the next round, there is a plan to also include a review of quality assurance of research into the model. Currently, the system is composed of institutional reviews, programme evaluations, appraisal of applications for degree awarding powers and thematic evaluations. There is a general trend towards more trust and development rather than control because there are concerns about evaluation fatigue in the sector.

In 2017, UKÄ obtained an assignment from the government to develop a procedure for quality assurance for research and the third mission. The core idea was that quality assurance should take a more holistic perspective over time and cover different tasks that higher education institutions engage in. UKÄ first worked on establishing a framework for what such a review process could look like. The sector was involved in the consultation process. The main emphasis is that this is not an evaluation of research results or content but of the procedures that universities have installed to secure and enhance research quality.

The pilot, which involved three universities, was launched in 2019. The three universities participating in the pilot are all reasonably small, where research is an activity that is being supported and developed. All three seem to be institutions with a strategic interest in developing and strengthening research tasks. An emphasis in the pilot is on examining the internal routines for working with research quality. The experience from the pilot broadly shows that the evaluation of education and research do have rather different dynamics, raising questions about whether a comprehensive evaluation that combines all tasks would be appropriate and feasible in the future. Nevertheless, the pilot also provided a number of specific lessons learned, for example, concerning evaluation criteria.

## 3.2 How do agencies manage new tasks and new fields?

### 3.2.1 Overall developments at the six agencies

Examining the six agencies, their overall development and status is quite different. Although some agencies have been established and remain in their initial form, others have gone through merger processes. In some instances, these mergers have also broadened the horizon of the agencies. In Table 2, we have summarised some key characteristics of the six agencies examined in this working paper.

**Table 2. Characteristics of the six agencies**

	A3ES	Evalag	FINEEC	NVAO	QQI	UKÄ
Est.	2009	2000	2014 (merger) (FINHEEC 1996)	2005	2012 (merger)	2013 (QA since 1995)
Country	Portugal	Germany	Finland	The Netherlands	Ireland	Sweden
Status	Private law foundation of public utility	Foundation under public law	part of the Finnish National Agency for Education - an independent expert operation under the Ministry	An international, treaty-based body under public Dutch law	Independent state agency	Independent government agency
Size	20-30	About 20 (incl administrative staff)	About 50 (10–12 in HE)	30-40	About 75	About 90

A starting point for the analysis was that we presume quality assurance agencies as having a considerable national dimension. As such, it is not particularly surprising that we find considerable national variations in the formal status of agencies and that this said variation does not seem to be declining over time. Perhaps the opposite could even be argued: the experiences from NVAO, a cross-border agency, also seem to suggest that national variations can also increase where strong collaborative links have existed. A key driver for this is the national context, where the policies and priorities for higher education have distinctly national dimensions.

Although all the agencies have legally defined formal autonomy to engage in quality assurance tasks, their formal status varies. In addition, their practical opportunities to embark on new endeavours vary as well. Often, this is dependent on the available resources and personnel. Although agencies would be able to initiate new tasks with relevance to their mandate, this may be limited by their personnel and resources, especially when these are primarily from public sources. Up until now, none of the six agencies seems to have been reduced in size. Nevertheless,

several informants emphasised the need to focus on efficiency and cultivate a lean and agile approach. As explained by one of the informants—if agencies want quality assurance to not be a bureaucratic exercise, they also need to show this in their own internal operations. Several of the agencies in focus here are also comparatively small; in some of the interviews, this necessity work in a flexible manner is particularly emphasised, this also being a means to reduce vulnerability to changes and new demands.

Although some agencies have either received or themselves initiated new tasks, agencies that have been subject to various merger or reorganisation processes experience being connected to new tasks and domains in the system. Through this, more traditional quality assurance agencies have been merged with other public agencies that have adjacent or similar tasks. This can be observed, for example, in Finland and Ireland. The merger in Finland means that the agency now also has a task to engage in evaluative tasks for other educational sectors. In Ireland, the quality assurance agency also has responsibilities for qualifications. A similar situation can be observed in Sweden, where the new agency established in 2014 also is responsible for educational statistics. Such merger or reorganisation processes can also be seen as a means for authorities to address the issue of fragmentation that has taken place in the horizontal specialisation in agencification processes. Because these merger processes vary considerably between various countries, one can argue that this further diversifies the quality assurance agency landscape in Europe.

Agency positioning both in the national context and the international field of quality assurance seems to be quite important. Although some agencies show a clear sense of path dependency, others have made more radical breaks and shifts in their development. Pressures towards path dependency involve staff competence profiles over time (low turnover of staff), lack of domestic competition (a single agency with an established position) and a stable higher education system. Pressures towards more radical shifts include a more unstable environment and enhanced competition. We can also observe that the identity of these various agencies is different—although some perceive themselves as autonomous organisations who develop their own profile, in such a manner indicating agency drift in taking a more autonomous role, others perceive themselves as being part of the state apparatus. The latter still implies emphasis on independence and autonomy, but the agency is nevertheless perceived as a part of a public system of higher education governance.

### 3.2.2 Transforming quality assurance, and finding new tasks and fields

Agencies' engagement with new tasks and fields varies considerably, as indicated in the brief case descriptions. Yet there are multiple sets of moving targets here. Although agencies are transforming by adopting new tasks and engaging with new fields, in most of the six agencies, the task of quality assurance itself is also being transformed in a more or less incremental manner. For instance, the appreciative approach adopted by NVAO principally represents a new regime for quality assurance, not a new task in itself. As emphasised by some informants, higher education institutions are also transforming, and quality assurance must keep up with these developments. This has included, for example, debates on whether study programmes are the appropriate unit for evaluation and accreditation, new challenges concerning international cross-border educational endeavours, digitalisation and e-learning and so forth.

In other agencies, changes in regular quality assurance tasks have been more incremental and primarily concern a shift towards accreditations and audits on the institutional level rather than programme levels. This means that the general scope of work designated for regular quality assurance tasks takes up a smaller share of overall agency capacity. Although not all the agencies among the six have embarked on new tasks *because of* their reduced quality assurance related tasks (e.g., some of the tasks may have been there prior to changes in quality assurance tasks or may be an addition at this point), most of the informants we talked to express an expectation that they do expect quality assurance tasks to become transformed—become more efficient, light touch, risk-based and less bureaucratic. For agencies that are operating in a more unstable environment, the changing quality assurance task also creates a more existential discussion—if quality assurance tasks take up less capacity, what will this additional capacity be used on instead?

In this review, we have identified a range of new tasks and fields. The most obvious new task keeps agencies in the field of higher education, expanding the scope of quality assurance to also concern research. FINEEC, UKÄ and NVAO are in various stages of this development. FINEEC audits have included research from the outset, UKÄ has recently completed a pilot, and NVAO is currently considering this.

Concerning other new tasks, this can lead agencies in different directions. For example, new tasks can both include new regulative tasks (e.g., QOI, UKÄ) or, alternatively, development towards consultancy and research (e.g., evalag, A3ES). These directions can be seen as somewhat different pathways for developing new tasks—where the former emphasises a stronger role within state administration of the sector and the latter emphasises a more flexible role that is more detached from accountability functions in the system. The new tasks in our analysis have both been developed based on internal strategic developments or as a result of

external demands (sector expectations or needs) or delegation processes (tasks assigned by the state). Some tasks emerge because of merger processes (e.g., exploring interconnections to new sectors). In some instances, we can also observe a process of ‘boomeranging’—where the agency may lobby for specific tasks to be identified in the system and, over time, acquire this task as part of their portfolio.

Concerning existing and new fields, agencies again vary. When exploring fields beyond higher education, FINEEC is actively working on this, while some other agencies also have discussions on, for example, lifelong learning.

Another new field is represented by new geographical areas, and here, the agencies vary. Some clearly operate within a nation state, while others are much more European oriented. Yet all have some form of international outlook and collaboration. The agencies also vary in how they address the field—or the ‘market’—for quality on the European level. Having a competitive position seems to matter here—where threats to survival emerge, the agencies are also to a larger extent pressured to adapt. Those with limited competition at the national level also seem to operate in a more stable environment. Nevertheless, for the agencies that do have a more nationally oriented profile, there is an awareness that cross-border quality assurance likely ‘is coming’ and that it may be strategically useful to be prepared—both by having some international experience and by being able to explain to the sector nationally why they should be the preferred agency for assessments.

Essentially, the continuous transformation and polishing of quality assurance regular tasks, while also expanding to new tasks and fields, portrays quality assurance agencies as ambidextrous organisations (March, 1991). For legitimacy, they depend on providing quality assurance tasks that are perceived as relevant, efficient and accepted. Nevertheless, they also need to embark on new tasks and fields to remain at the forefront of the developments. The arguments about ambidextrous organisations suggest that to be successful and survive over time, organisations need to balance both exploitation (further develop existing tasks by making them more efficient and effective and with fewer ‘errors’) and exploration (engage in new tasks). In other words, organisations both need to engage in the exploration of new possibilities and exploitation of old certainties; here, to succeed, organisations need a balance of the two (March, 1991). The fact that organisations need to engage in both also means that there is a continuous trade-off in internal resource allocation and capacity of attention. For success, thus, the competitive position of agencies can be expected to matter, as would the stability of the environment.

### 3.2.3 Future outlook

What, then, is the next step? In all the agencies we have examined, there is an acute awareness of the question ‘what’s next?’. Quality assurance tasks are transforming; there are new tasks and engagement with new domains and cross-border activities. There is a strong emphasis on quality assurance having to be a flexible and dynamic endeavour and a concern for bureaucratisation processes. In nearly all the interviews, there is an emphasis on continuous development. This, in turn, can be seen as creating some tensions with the rather standardised emphasis of ESGs. Although it is evident that the agencies view the European level as an important part of their future discussions, there is also wariness and concern for the division of labour between ENQA and EQAR and whether there is sufficient space for innovation in the context of a standard emphasis. Although most have found a means to find a workable balance at this point, future developments remain a discussion.

It is clear that the quality assurance landscape in Europe remains diverse. Of course, this diversity is both expected and necessary given the diversity of higher education systems in Europe. Nevertheless, there are developments that may make this diversity an object of discussion. For example, in some interviews, the complexity concerning the European University Initiative came up, indicating that there is still a considerable way to go for seamless collaboration between various European quality assurance systems at this point.

## 4 Incrementalism, innovation or transformation?

By studying six agencies in different parts of Europe, we have illustrated some dynamics that are currently playing out in the field of quality assurance. From these six cases, we cannot claim that European quality assurance is radically transforming as a whole—in this respect, the selected cases are not representative of Europe as such. The agencies were chosen because they are among those in the field that have substantial experience and where there is a will—and sometimes even a need—to experiment with respect to both roles and repertoires. In this way, our six cases provide an early look into the future of quality assurance.

What have we found? What we observe are that agencies—despite tremendous interest in building a European Higher Education Area—tend to have a strong national orientation and where they are still under substantial control and influence by national authorities. This continued political interest in the agencies can be interpreted in various ways. On the one hand, it can be seen as a need for national authorities to have a potent instrument to be used in the continuous steering of higher education. On the other hand, political attention can also be seen as a sign of recognition of having an instrument at their disposal, allowing for experimentation and piloting new political initiatives in the sector. Seen from an agency point of view, this does not represent radical change. Although we currently may take external quality assurance for granted—it is only a little over two decades ago that the quality assurance revolution started in Europe—and agencies throughout the region have experienced numerous reorganisations and an almost constant stream of change processes ever since (Hopbach & Fliermann, 2020). As such, one could argue that the current dynamics are part of the continuing incremental changes that always take place in quality assurance.

At the same time, we also find evidence of innovations that most European agencies are not involved in: quality assurance of research, the undertaking of independent research activities or consultancy, to mention some. Although some of these activities have been part of the operations of the agencies in question for quite some time, these are still activities that most European agencies do not

engage in. Interestingly, the examples above, they do represent new tasks—but not necessarily new fields. The activities are still focused on higher education institutions. As such, these innovative practices may be interpreted as an expansion of the core operation: quality assurance of higher education. Higher education institutions are also changing, taking on a more visible role in societal development and with new societal expectations being placed on them. The changing activities of the institutions of higher education could also imply new responsibilities for quality assurance agencies. Hence, perhaps it is only a matter of time before more agencies might be evaluating the activities related to the third mission and focusing on the societal impact of higher education.

However, we also see signs of transformations—of agencies entering into new fields—such as when FINEEC merged with another agency and expanded its activities into lower educational levels. When both taking up new tasks and entering a new field, one could ask the following: How much change needs to take place before the agency is fundamentally altered and it becomes something else? We are certainly not there yet, but as traditional quality assurance activities are becoming lighter and taking up less agency capacity, a future transformation may not be far away for some agencies. Such transformations may not always be externally imposed on the agencies. What we have found is that agencies may start the initiatives towards such radical transformations themselves—driven by an experienced and competent staff, their interests and priorities. In some of our cases, staff expertise and ideas have yielded interesting outcomes. Hence, the drift of agencies may stem from both external and internal dynamics.

Although agency drift can indeed be observed in our cases, we should not forget the European dimension of quality assurance. Even though in our cases the European dimension has been somewhat in the background—not least because of the strong national orientation and dependency—Europe may still be both a source of inspiration as well as creating tensions between domestic and European roles and responsibilities. Europe may also be a potential new field for agencies to explore. Although some agencies in Europe are already operating in other countries, recent initiatives such as the European Universities may represent interesting options for further renewal of what quality assurance could look like in Europe. Because many European universities these days are looking for university alliances to join, one may argue if not the same need to find partners may be relevant to quality assurance agencies.

Quality assurance agencies are—as are other agencies—in a difficult position. They are always ‘in between’. They are in between the classical control–improvement dichotomy; they are in between a state eager to govern and a higher education sector protecting its autonomy; they are in between a European level and national authorities; they are in between the higher education sector and society.

Needless to say, this position is a challenging one to manoeuvre through. At the same time, they are also in an interesting position where many opportunities exist. Our cases demonstrate that some agencies indeed are exploring these opportunities.

# References

- Ahrne, G., & Brunsson, N. (2008). *Meta-organizations*. Cheltenham: Edward Elgar Publishing.
- Brennan, J., & Shah, T. (2000). *Managing Quality in Higher Education. An International Perspective on Institutional Assessment and Change*. Buckingham: SRHE/Open University Press.
- Christensen, T., & Lægheid, P. (2006). Agencification and regulatory reforms. In T. Christensen & P. Lægheid (Eds.), *Autonomy and regulation. Coping with agencies in the modern state* (pp. 8-49). Cheltenham: Edward Elgar.
- Coates, H. (Ed.) (2014). *Higher Education Learning Outcomes Assessment. International perspectives*: Peter Lang.
- Dill, D. D., & Beerkens, M. (2010). *Public policy for academic quality: Analyses of innovative policy instruments* (Vol. 30): Springer Science & Business Media.
- Eaton, J. S. (2018). Combating academic corruption: Quality assurance and accreditation. *International Higher Education*(93), 8-9.
- ENQA. (2008). *Quality procedures in the European Higher Education Area and beyond: Second ENQA survey*. Helsinki: ENQA.
- ENQA. (2012). *Quality procedures in the European Higher Education Area and beyond: Third ENQA survey*. Brussels: ENQA.
- ENQA. (2015). *Quality procedures in the European Higher Education Area and beyond: Internationalisation of quality assurance agencies*. Brussels: ENQA.
- Gornitzka, Å., & Stensaker, B. (2014). The development of a European regulatory space. *Policy & Society*, 33(3), 177–188.
- Hopbach, A., & Fliermann, A. (2020). Higher education: a rapidly changing world and a next step for the Standards and Guidelines for Quality Assurance in the European Higher Education Area. Brussels: ENQA.
- Huisman, J., & Westerheijden, D. F. (2010). Bologna and Quality Assurance: Progress Made or Pulling the Wrong Cart? *Quality in Higher Education*, 16(1), 63-66.
- Jongbloed, B., & de Boer, H. (2020). Performance Agreements in Denmark, Ontario and the Netherlands. Enschede: University of Twente, CHEPS.

- Karakhanyan, S., & Stensaker, B. (2020). *Global Trends in Higher Education Quality Assurance. Challenges and Opportunities in Internal and External Quality Assurance*. New York: Brill/Sense.
- Kehm, B., Huisman, J., & Stensaker, B. (Eds.). (2009). *The European Higher Education Area: Perspectives on a Moving Target*. . Rotterdam: Sense Publishers
- Kis, V. (2005). Quality assurance in tertiary education: Current practices in OECD countries and a literature review on potential effects. *Tertiary Review: A contribution to the OECD thematic review of tertiary education*, 14(9).
- Levi-Faur, D. (2011). Regulatory networks and regulatory agencification: towards a Single European Regulatory Space. *Journal of European Public Policy*, 18(6), 810-829.
- March, J. G. (1991). Exploration and exploitation in organizational learning. *Organization Science*, 2(1), 71-87.
- Stensaker, B. (2018). Quality assurance and the battle for legitimacy - discourses, disputes and dependencies. *Higher Education Evaluation and Development*, 12(2), 54-62.
- Stensaker, B., Langfeldt, L., Harvey, L., Huisman, J., & Westerheijden, D. F. (2010). An in-depth study on the impact of external quality assurance. *Assessment & Evaluation in Higher Education*, 36(4), 465-478.  
doi:10.1080/02602930903432074
- Thatcher, M., & Coen, D. (2008). Reshaping European regulatory space: an evolutionary analysis. *West European Politics*, 31(4), 806-836.
- Trondal, J. (2014). Agencification. 74(4), 545-549.
- Westerheijden, D. F. (2001). Ex oriente lux? National and multiple accreditation in Europe after the fall of the wall and after Bologna. *Quality in Higher Education*, 7(1), 65-76.
- Westerheijden, D. F., Stensaker, B., & Rosa, M. J. (2007). *Quality assurance in higher education: Trends in regulation, translation and transformation* (Vol. 20). Dordrecht: Springer Science & Business Media.
- Westerheijden, D. F., Stensaker, B., Rosa, M. J., & Corbett, A. (2014). Next generations, catwalks, random walks and arms races: Conceptualising the development of quality assurance schemes. *European journal of education*, 49(3), 421-434.

Nordisk institutt for studier av  
innovasjon, forskning og utdanning

Nordic institute for Studies in  
Innovation, Research and Education

[www.nifu.no](http://www.nifu.no)