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Timo Ala-Vähälä

Coping with Diversity in Higher Education in the European Higher Education Area

The Case of Quality Assurance



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Esitetään Jyväskylän yliopiston humanistis-yhteiskuntatieteellisen tiedekunnan suostumuksella julkisesti tarkastettavaksi yliopiston vanhassa juhlasalissa S212 tammikuun 30. päivänä 2020 kello 12.

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ABSTRACT

Timo Ala-Vähälä

Coping with diversity in higher education in the European Higher Education Area. The case of quality assurance

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This study analyses diversity in quality assurance (QA) of higher education among the Bologna Process member countries and the policy processes that aimed at coping with the challenges related to it. The dissertation consists of a summary and four articles.

The results of this study and previous literature illustrate substantial empirical evidence of diversity between QA systems and conceptual and terminological fuzziness as well as a lack of transparency. The Bologna Process has introduced two main ways for coping with the challenges associated with diversity in QA: (a) standards that would guide the activities of QA agencies and (b) a European-level QA system for QA agencies.

During the Bologna Process, the European Commission strove towards output oriented systems of quality assurance that would guarantee that the provision of education meets the common European standards stated in the European Qualifications Frameworks (EQF), whereas the European university Association (EUA) supported an alternative set of standards that would focus more on QA processes and support the management in universities.

In the case of European-level QA structures, the EUA and the European Network/Association of Quality Assurance (ENQA) both suggested structures that would give them and their member organisations (universities or QA agencies) a central role, whereas the Commission proposed a system that would have been more independent from the stakeholder organisations in this field. The end-result of this process was the European Registry of Quality Assurance Agencies (EQAR), which is most reminiscent of the version suggested by the Commission, although it includes elements that the other organisations have suggested and even piloted.

The study also discusses the tensions between national-level and European-level policymaking, showing that the national-level translations of the European-level commitments link the QA reforms more to other reforms relevant in the national context than the context that motivated the commitments at the European level. In addition, it appears that the Commission intended to loosen the QA systems from national contexts towards multinational structures but that the Bologna Process member states were unwilling to follow this route.

Keywords: Higher education, Bologna Process, Quality assurance, European Higher Education Area

TIIVISTELMÄ (ABSTRACT IN FINNISH)

Timo Ala-Vähälä

Korkeakoulutuksen monimuotoisuuden haaste eurooppalaisella korkeakoulutusalueella. Esimerkkitapauksena laadunvarmistus

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Tutkimuksen kohteena on laadunvarmistuksen monimuotoisuus Bolognan prosessin jäsenmaiden keskuudessa sekä ne politiikkaprosessit, joiden tavoitteena on ollut hallita monimuotoisuutta ja sen tuottamia haasteita.

Väitöskirja koostuu yhteenveto-osasta ja neljästä artikkelista. Tutkimuksen tulokset sekä aiempi tutkimuskirjallisuus vahvistavat olettaman laadunvarmistuksen monimuotoisuudesta, siihen liittyvän käsitteellisen ja terminologisen sekavuuden sekä läpinäkyvyyteen liittyvät ongelmat. Bologna prosessi on vastannut kahdella tapaa korkeakoulutuksen laadunvarmistuksen monimuotoisuuden haasteisiin: (a) määrittelemällä standardeja, jotka ohjaavat laadunvarmistuksen yksikköjen toimintaa sekä (b) perustamalla eurooppalaisella tasolla toimivan laadunvarmistusyksikköjen rekisterin, johon hyväksytään vain laadunvarmistuksen standardeja vastaavat yksiköt.

Bolognan prosessin aikana Euroopan komissio on pyrkinyt kohti koulutuksen lopputuloksia arvioivia laadunvarmistuksen järjestelmiä, joissa arvioinnin kriteerit olisi kytketty korkeakoulutuksen eurooppalaisiin viitekehyksiin, kun taas Euroopan yliopistoliitto (EUA) on kannattanut järjestelmää, jossa laadunvarmistuksen standardit kohdistuisivat laadunvarmistuksen menettelytapoihin ja tukisivat yliopistojen ja korkeakoulujen johdon työtä.

Laadunvarmistuksen eurooppalaisen tason rakenteiden osalta sekä Euroopan yliopistoliitto (EUA) että eurooppalaisten arviointitoimijoiden järjestö ENQA ovat esittäneet järjestelmiä, jotka antaisivat keskeisen roolin esittäjäorganisaatioilleen itselleen ja niiden jäsenorganisaatioille, eli joko yliopistoille ja korkeakouluille tai ulkoisen laadunvarmistuksen yksiköille. Euroopan komissio puolestaan ehdotti järjestelmää, joka olisi ollut riippumaton yksittäisistä etujärjestöistä. Prosessin lopputuloksena syntynyt organisaatio, Euroopan laadunvarmistusyksikköjen rekisteri, on toteutukseltaan lähinnä komission esittämää mallia, vaikka siinä on myös EUA:n ja ENQAN ehdottamia ja kokeilemia ominaisuuksia.

Tutkimuksessa tarkastellaan myös eurooppalaisen tason ja kansallisen tason välisiä jännitteitä poliittisessa päätöksenteossa. Tutkimus osoittaa, että eurooppalaisen tason sitoutusten kääntäminen kansallisen tason toimintaympäristöön on liittänyt uudistukset kansallisesti tärkeisiin uudistushankkeisiin ja heikentänyt yhteyttä tavoitteisiin, joiden pohjalta eurooppalaisen tason sitoumuksista sovittiin. Lisäksi vaikuttaa siltä, että komissio on pyrkinyt etäännyttämään laadunvarmistuksen järjestelmiä kansallisista toimintayhteyksistä kohti rajat ylittäviä rakenteita, mutta Bolognan prosessin jäsenmaat ovat suhtautuneet vastahakoisesti tähän kehityssuuntaan.

Asiasanat: Korkeakoulutus, Bolognan prosessi, laadunvarmistus, eurooppalainen korkeakoulutusalue

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Helsinki December 16, 2019 Timo Ala-Vähälä

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LIST OF ACRONYMS AND ABBREVIATIONS

BFUG	Bologna Follow-Up Group
CRE	European Conference for Rectors and Vice-Chancellors
CEPES	European Centre for Higher Education
ECTS	European Credit Transfer and Accumulation System
EHEA	European Higher Education Area
ENIC	European Network of Information Centres
ENQA	European Association for Quality Assurance in Higher Education
	(formerly European Quality Assurance Network)
EQAR	European Quality Assurance Register for Higher Education
EQF	European Qualifications Framework
ESG	Standards and Guidelines for Quality Assurance in the European
	Higher Education Area
ESIB	European Student Information Bureau
ESU	European Student Union
EU	European Union
EUA	European University Association
EURASHE	European Association of Institutions in Higher Education
FINHEEC	Finnish Higher Education Evaluation Council
HEI	Higher Education Institution
HPS	High Participation System (of higher education)
IEP	Institutional Evaluation Program (of the European University
	Association)
IER	International Educational Regime
INQAAHE	International Network of Quality Assurance Agencies
MLG	Multi-Level Governance
NARIC	Network of National Academic Recognition Information Centres
NVAO	De Nederlands-Vlaamse Accreditatieorganisatie [The Accreditation
	Organisation of the Netherlands and Flanders]
OECD	Organisation for Economic Cooperation and Development
OMC	Open Method of Coordination
OPM	Opetusministeriö [Ministry of Education]
QA	Quality Assurance
QF-EHEA	Qualifications Frameworks in the European Higher Education Area
R&D	Research and Development
TEEP	Transnational European Evaluation Project
UAS	University of Applied Sciences or Universities of Applied Sciences
UNESCO	United Nations Educational, Scientific and Cultural Organization

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1 INTRODUCTION

This study discusses diversity in quality assurance (QA) of higher education among the Bologna Process member states and the policy processes that intend to cope with the challenges related to it.

Diversity in this context refers to (a) the different ways of organising QA at the national level and the potential incompatibility between various national systems, (b) the different ways of naming and describing the QA systems and (c) the different ways in which governments and various stakeholders may interpret QA targets. Thus, diversity may concern differences at organisational and procedural levels, terminological or conceptual levels, different interpretations of QA at the European and national levels as well as at the level of higher education institutions (HEIs).

The term 'quality assurance' (QA) in this context refers to the systems or processes that HEIs are expected to carry out in order to guarantee that that they meet the standards of higher education.¹ QA also includes the systems that are intended to support university management in improving the activities of their institutions. QA is normally divided into internal—carried out by management and faculties—and external—usually carried out by independent agencies. Academic work also includes procedures that can be defined as QA of its kind (e.g. peer reviews of scientific publications), although this study does not discuss them.

The term 'diversity' has both positive and negative connotations. It may be connected to conceptual and terminological fuzziness or lack of transparency. On the other hand, the diversity or phenomena that are characterised as diverse can be seen as indicators of creativity, innovativeness and openness to new challenges (e.g. Huisman, 2009; EUA, 2010; ESG, 2005, p. 10; EUA, 2004; EUA, 2001, p. 8). The London Communiqué (2007) of the Bologna Process Communiqué emphasises the positive value of diversity in the following manner:

¹ The term 'level of education' is a topic of discussion on its own. Sections 2.3, 3.3 and the Conclusion chapter discuss the challenges of defining frameworks for academic qualifications and their use in QA.

Building on our rich and diverse European cultural heritage, we are developing an EHEA [European Higher Education Area] based on institutional autonomy, academic freedom, equal opportunities and democratic principles that will facilitate mobility, increase employability and strengthen Europe's attractiveness and competitiveness.

The term 'fuzziness of terms and concepts' illustrates the fact that the information provided from different countries and levels of education may be elliptical, contradictory and open to interpretation. This lack of transparency means that the perceived common understanding of QA in Europe may be based on false or misleading assumptions. However, fuzziness may allow countries to participate in the Bologna Process and translate their commitments into a national context in a way that adapts to the existing conditions in respective countries. Thus, fuzziness may be construed as an advantage and disadvantage at the same time.

When this study speaks about coping with diversity and its challenges, it discusses projects and policy processes that

- attempt to clarify the terminology,
- intend to harmonise the QA systems and
- aim to enhance the transparency and credibility of diverse QA systems.

The Bologna Process aims at creating and enhancing a unified European Higher Education Area (EHEA). The EHEA targets are stated in the Bologna Declaration of 1999 and in several communiqués of the ministerial meetings, which include, among others, a three-level system of academic degrees and systems of QA. However, the process of creating the EHEA is not legally binding—it is based on the voluntary commitment of each participating country and every country that participates in the process may interpret the Bologna Process commitments according to its own national interests (Ravinet, 2008). Each country can make independent decisions about its provision of education, funding, resources and all other policy decisions that can affect the quality of education. This situation implies wide diversity in various national implementations of the Bologna targets. Because the task of assuring higher education quality has been devolved to national agencies, it is reasonable to ask whether this system can guarantee that higher education will reach the same level of quality across all participating countries.

Hence, the main research question of this study is:

How has the Bologna Process dealt with the challenge of diversity and the conceptual and terminological fuzziness related to it in the field of QA?

The research question has been divided into the following five subquestions:

- How has diversity in QA manifested itself during the Bologna Process?
- How have the Bologna Process and its actors tried to cope with this diversity?

- What kinds of agendas have the main actors' contributions revealed during the Bologna Process?
- What does a case study of national interpretation reveal about diversity in the field of QA?
- How have new structures been perceived among the personnel in HEIs?

The study mainly focuses on the policy processes that were carried out between years 1999–2015; in other words—from the year of the Bologna declaration (1999) to the year in which the second version of the document 'Standards and Guidelines for Quality Assurance in the European Higher Education Area' was accepted (2015).

According to Zahavi and Friedman (2019), the nature of the Bologna Process requires participants to trust one another and one of its targets is to increase trust among the members. Therefore, a phrase such as 'coping with diversity and its challenges' does not mean that policymakers have tried to unify QA systems. Instead, it usually concerns increasing transparency and trust in the various systems of higher education in the Bologna area. In some cases, the policy processes have aimed to clarify terminology and to survey national practices; while in other cases, to create more transparency and standards for QA processes.

The Bologna Process may not be the only unifying force in the sphere of European higher education and its QA. Even without the Process, there would be shared ideologies of higher education management (e.g. New Public Management), massification and development of global markets. All these may boost unifying tendencies in higher education, either directly or via governmental interventions. These topics have been excluded from this study, unless they are directly connected to the main research question. (For more on New Public Management research, see Broucker et al., 2017; Diogo, 2016; on the effects of massification, see Cantwell et al., 2018a; on higher education reforms in some Bologna Process countries, see Broucker et al., 2019a).

This study advances the following arguments. First, diversity at the terminological, conceptual and institutional levels can lead to terminological and conceptual fuzziness. In other words, the same terms may refer to diverse systems and practices, while the same practices may have different terms or descriptions depending on the contexts in which they are being used or presented. These kinds of diversity and fuzziness may threaten the credibility of the EHEA. Second, the Bologna Process has tried to create systems and structures to help various stakeholders cope with the fuzziness resulting from diversity. Third, these efforts may have created new sources of diversity or fuzziness at the same time. Finally, the policy processes that aim to ease coping with the challenges of diversity reveal some fundamental differences in policy interests, especially between the European Union (EU) and the European University Association (EUA).

This study does not provide a comprehensive analysis of diversity in the field of QA among the Bologna Process member states.² Instead, it looks at the cases that reveal the nature of diversity and analyses the processes of creating European-level structures intended to cope with diversity; it also explores the structure of the external QA system in a single-case country (i.e. Finland).

This dissertation consists of a summary and four articles that study diversity and the policy processes intended to create structures for increasing the credibility and transparency of QA systems at the European and national levels as well as at the level of Finland's HEIs.

The first article discusses conceptual and procedural diversity and the terminological fuzziness of QA among the EHEA countries. The second article explores the process of creating European-level structures that would guarantee credibility of national agencies responsible for QA; it also pays particular attention to the role of the European Association for Quality Assurance in Higher Education (ENQA) in this process. The third article investigates the Finnish case of setting up a system of audits of the systems of internal quality assurance in HEIs and its impact on higher education. Finally, the fourth article analyses the reception of these new QA structures among the HEI personnel in Finland.

This summary discusses the challenges of diversity in QA in the following manner: Chapter 2 provides a general overview of the Bologna Process and its main structures. Chapter 3 elaborates on the role of QA in this Process, including its development prior to the Bologna Declaration and the main European-level structures developed during the first decade of the Process; it also elaborates on the Finnish history of establishing internal and external QA systems to meet the commitments stated in the Berlin Communiqué of 2003. Chapter 4 reviews the literature on diversity and the unifying forces in higher education and QA in Europe. Chapter 5 presents the results of the articles that form the basis of this study. Chapter 6 concludes the previous chapters and explains how the main actors of the Bologna Process have tried to cope with the challenges of diversity in QA; it also delineates what the case study of Finland reveals about diverse interests at the European and national levels.

The articles presented in this dissertation draw on several methods. The first article, which discusses diversity in four countries, analyses various policy documents. The second article, which explores the process of creating European-level structures of QA and the role ENQA plays in it, is primarily based on interviews. The third article, a book chapter that describes the Finnish system of audits and its impacts on education, is based on Ala-Vähälä's and Saarinen's previous studies that have utilised both qualitative and quantitative methods. (Ala-Vähälä 2011, Ala-Vähälä 2009; Saarinen and Ala-Vähälä 2007; Saarinen 1995a; Saarinen 1995b, Saarinen 2005.) The fourth article, which analyses the reception of new QA systems among the Finnish HEI personnel is based on quantitative data.

 $^{^{\}rm 2}$ The studies on diversity and convergence of higher education systems are discussed in Chapter 4.

2 THE BOLOGNA PROCESS

2.1 Important milestones before the Bologna Process

The formal starting point for the Bologna Process was the Bologna Declaration of 1999, originally signed by 29 European countries. The objective of the Process was to create a European Higher Education Area by enhancing the mobility of students and researchers through a standard structure of degrees, supporting cooperation in QA and adding a European dimension to higher education (Bologna Declaration, 1999).

The Bologna Declaration states that participating countries would coordinate their policies by

- adopting a system of easily readable and comparable degrees in higher education;
- adopting a system that would be based on two primary cycles of studies undergraduate and graduate;
- establishing a system of credits to promote student mobility;
- promoting the mobility of students and researchers;
- promoting QA cooperation to develop comparable criteria and methodologies and
- promoting European dimensions in higher education in the spheres of curricular development, inter-institutional cooperation, mobility schemes and integrated programmes of study, training and research (Bologna Declaration, 1999).

According to the Declaration, these targets would be implemented by 2010; however, the biennial or triennial meetings and other structures that support the implementation of the objectives continued throughout the subsequent decade (i.e. 2010s). During the implementation, new topics began to emerge, such as lifelong learning (Prague Communiqué, 2001), doctoral education (Bergen Communiqué, 2005), a system for defining educational qualifications (Bergen

Communiqué, 2005) and the social dimension of higher education in EHEA (London Communiqué, 2007).

The Bologna Process was launched at about the same time as the EU's Lisbon Strategy for years 2000–2010 in which the goal of the EU for the following decade was 'to become the most competitive and dynamic knowledge-based economy in the world capable of sustainable economic growth with more and better jobs and greater social cohesion'. (European Council, 2000, 5§.) An essential element of the Lisbon Strategy (2000) was to create a European Research Area that would include activities such as creating structures to support cooperation, networking, private sector investments and research and development (R&D) partnerships (Keeling, 2006).

The Bologna process has fundamentally changed European higher education systems. By 2012, almost all participating states had accommodated their academic degrees to a system of three cycles of bachelor, master and doctoral level degrees and established new QA structures at both national and European levels (Bologna Process, 2012). During the process, the number of signatory countries gradually increased from 29 in 1999 to 48 in 2019. In 2016, the EHEA covered almost all European countries, ³ Turkey, South Caucasian countries (i.e. Armenia, Azerbaijan and Georgia) and Kazakhstan (from the Asian side of the former Soviet Union).

The Bologna Declaration does not represent the first step in the process of creating a common higher education area. Before the process began, there had been at least two development tracks: (a) launching programmes for student mobility and (b) declarations and other agreements to enhance the mobility of students and researchers by stressing the value of a more unified system of academic degrees and/or QA transparency.

Verhoeven et al. (2019), Pechar (2007) and Huisman and Van der Vende (2004) state that, after student mobility programmes were implemented and became prevalent, it became evident that the European systems of higher education were so diverse and the mutually incompatible that they would not meet the requirements of student mobility. Pechar (2007) claims that national authorities were not willing to facilitate studying in a foreign university, hampering the recognition of foreign degrees. This situation indicates that the European Commission may have had the motivation to support the processes that would lead to a more unified system of higher education.

The second development track consists of declarations and conventions that enhanced the mobility of students, graduates and researchers. This track dates back to the Sorbonne Declaration (1998) and to the Magna Charta of the European Universities, which was signed in Bologna in 1988. The Magna Charta of European universities was signed in 1988—on the 900th anniversary of the University of Bologna—by the chancellors of 388 universities. It emphasises the value of higher education for cultural, social and economic development. It also appreciates the value of academic freedom and institutional autonomy and

³ European countries that do not belong to the EHEA are either states of unclear status (e.g. Kosovo) or microstates (e.g. Monaco, San Marino).

mobility among students and faculty, supporting policy actions towards a more unified—or equal—system of degrees (The Magna Charta Universitarum, 1988; Diogo, 2016, p. 39).

The Lisbon Recognition Convention of 1997, a joint convention of the Council of Europe⁴ and UNESCO, represents an important step towards the mutual recognition of studies and certificates between the signatory states. It states that the degrees and periods of study must be recognised if suggested studies do not essentially differ from the education in the respective country where the recognition is requested. The Berlin Communiqué of 2003 enhances this convention by stating that the member states of the Bologna Process have to ratify this convention (Vögtle, 2014, pp. 10–11; Terry, 2008, pp. 134–136). In 1998, the European Council offered a recommendation on cooperation in QA in European higher education (European Council, 1998).

Some researchers argue that the Bologna Process originates from the Sorbonne Declaration of 1998 or that it represents, at least, a crucial step in the Process (Diogo, 2016, p. 40; Vögtle, 2014, pp. 11–16; Veiga & Amaral, 2009; Ravinet, 2008; Witte, 2006, pp. 124–125). In the Sorbonne Declaration, education ministers from four European countries called on other European states to create an open European area for higher learning; they also urged them to devise common frameworks for teaching and learning in order to enhance mobility and other forms of cooperation. They stated that degrees should be readable in the European context and consist of two cycles, undergraduate and graduate.

2.2 Main Bologna Process Actors in Quality Assurance (QA)

Most of the Bologna Process' main actors and its QA policy have already been mentioned; however, it is worth listing them, as well as their roles and mutual relations, in advance in order to make the analysis later on easier to comprehend. This list is not based on theoretical analysis of the Process but on the historical narrative that is presented in this and the two subsequent chapters (Chapters 2, 3 and 4).

The Bologna Process

Vögtle (2014, p. 22) states that the Bologna Process has reorganised the European higher education in two ways. First, it has changed the higher education structures and, second, it has altered the ways of coordinating the European higher education policies.

If we combine the essential elements of the characterisations presented above in the context of this study, it is reasonable to describe the Bologna Process

⁴ The Council of Europe is a European organisation that focuses on supporting democracy and human rights. Its decision-making body, the Council, consists of foreign affairs ministers. This should not to be confused with the European Council, a decision-making body in the EU that consists of the national leaders of the member states (see https://www.coe.int/en/web/portal, visited 14 May 2019).

as having two aspects: that of a reform process and, at the same time, that of an actor and organisation with its participants, secretariat and working procedures.

The legal status of the Bologna Declaration may explain some of the peculiarities of the Bologna Process. It is not a part of the EU legislation nor a treaty between the signatory states—it is a declaration of intentions and, thus, it does not require the signatory countries' ratification (Ravinet, 2008). No legal sanctions are in place to oblige the signatory countries to follow the principles of the Bologna Declaration or Bologna Communiqués. Garben (2010) points out that, due to the nature of the Bologna Process, there is hardly any political control over the Process at the EU level. The legislative processes linked to the implementation of the Bologna commitments may vary from country to country. Although the Bologna Process does not have any legal force, robust tools and mechanisms have been devised to keep it together (see the next chapter and Sections 4.3 and 4.4 for more details).

As an organisation, the Bologna Process consists of biannual ministerial meetings, the Bologna Follow-Up Group (BFUG) and a secretariat, which were established after the Berlin Conference of 2003 and are provided by the next Ministerial Conference host country.

The BFUG has three types of members: (a) full members consisting of the countries that belong to the EHEA and EU, (b) consultative members and (c) partners. Consultative members are from various stakeholder organisations, such as the Council of Europe, ENQA and EUA. Partners include organisations that wish to be associated with the Bologna Process/BFUG but are not included in the consultative member category (for descriptions of the Bologna Process administration, see Crozier & Parveva, 2013; Terry, 2008, pp. 117–118; Veiga & Amaral, 2009; Pechar, 2007; Corbett, 2006, p. 7ff).

European Union (EU)

Education was formally recognised as an area of EU jurisdiction in the Maastricht Treaty of 1992. It states that the European Community could contribute to it by encouraging cooperation between member states and by supporting and supplementing their actions. The Treaty adds that member states have the primary responsibility for the teaching content, the organisation of the education systems and the cultural and linguistic diversity (Diogo, 2016; Maassen & Musselin, 2009). Consequently, the harmonisation of national laws and regulations transcends its jurisdiction. However, the Bologna Process reveals that the EU has become an important actor in the field of education.

Gornitzka (2009) gives a systematic account of the EU's system of governance in higher education. According to her analysis, education—as a policy area—has a weak legal basis in the EU because it is considered to belong to the realm of nation states. At the time of the Gornitzka's study, the European Commission had a special directorate-general for education, youth, sport and culture, with a relatively small staff, equivalent to nearly 50% of the number of the personnel assigned to the European research policy. On the other hand, the Commission drafted its legal proposal, prepared new policies and coordinated

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the implementation of the EU policies by working with committees that consisted of Commission representatives and experts from various levels of administration in the member states. According to Gornitzka, the Commission's committee structure links member states' governments and different levels of administration with the Commission. EU programmes have also created their unique multi-level governance systems. In the field of education, these programmes are Erasmus and Socrates, joining administration at the European, governmental and university levels.

Gornitzka uses term 'multi-level governance', which refers to a broader theoretical discussion about the nature of governance within the EU. According to Gornizka (2009), the multi-level governance system of EU programmes (e.g. Erasmus), with several levels of interaction transcending national governments and the Commission's resources for funding actions that support its agenda, have given the EU and the Commission a stronger position than the legal basis indicates. The Bologna Process has also been defined as a case of multi-level multi-actor governance (Witte, 2006). The nature of multi-level and multi-actor governance is further discussed in Section 4.4.

Keeling (2006) stresses that, although the Bologna Process progressed outside the EU's formal policymaking zone, the European Commission has played an active role from the outset. The Commission initially developed many of the Bologna Process initiatives to support student mobility; for example, the ECTS was first piloted within the Erasmus network. The Commission also funded cooperation and reform projects that were in line with the Bologna objectives and supported national Bologna promoters and information activities. At the same time, the Lisbon Strategy and the Bologna Process strengthened the legitimacy of EU's role in higher education—they provide 'external' references that justify the Commission's increased activity in this field.

Concerning QA, Keeling (2006) stresses that the EU has a long history of enhanced transparency and mutual recognition of diplomas. As these activities belong to the field of vocational education, they have had a more explicit legal basis for being part of the community activities. The EU issued its first directive in this area in the 1970s and, in the 1980s, the National Academic Recognition Information Centres (NARIC) network was founded. It received its funding from the Socrates Programme, although it was acting quite independently. The NARIC works in close cooperation with the European Network of Information Centres (ENIC), which was established as a joint initiative of UNESCO and the Council of Europe and was intended for the implementation of the Lisbon Recognition Convention.

Maassen and Musselin (2009) state that the European Commission was intentionally excluded from the Sorbonne Declaration (1998) and the Bologna Declaration (1999); however, in 2001, it joined the Process, BFUG and the preparatory group (for the development of the role of EU, see Zahavi & Friedman, 2019; Vögtle, 2014, pp. 19–20; Veiga & Amaral, 2009). Although not a formal participant, the EU was an active player in the process from the beginning—it contributed to the preparation of the Bologna Declaration by financing

preparatory documents (Witte, 2006, p. 131; Diogo, 2016, p. 40) and, since then, it has supported various projects related to the Bologna Process and QA (Keeling, 2006). For instance, the establishment of the ENQA was partly funded by the EU (Ala-Vähälä & Saarinen, 2009).

The Lisbon Strategy (2000), which was a parallel and, in some cases, an overlapping process to the Bologna Process, aimed at creating a European Research Area, including activities such as creating structures to support cooperation, networking, private sector investments and R&D partnerships (Adelman, 2009, pp. 13–14; Terry, 2008, pp. 124–127; Keeling, 2006). According to Neave and Maassen (2007), the policy discursion of the Bologna Process originally differed from the Lisbon Strategy. The Bologna Process began by highlighting the cultural values of higher education; however, soon after the European Commission began participating in the Process, the emphasis moved towards more utilitarian values as the main aims of the Lisbon Strategy began infiltrating the Bologna Process.

The nature of the EU's stance in the field of QA is a central topic in this study. The following chapters will discuss how the Commission has defined its policy agendas related to some crucial topics of QA (see Sections 3.3 and 3.4); and what kinds of discursive practices it has created in order to support its general policy targets in the field of higher education QA (Section 4.3).

European Network/Association of Quality Assurance Agencies (ENQA)

The ENQA is an association that represents its members at the European level and internationally. Its members are QA organisations of higher education from the EHEA. The membership criteria are (currently) defined in the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) of 2015 (ENQA, 2015).

The historical roots that led to the establishment of the ENQA were presented above. A large EU-funded project on QA (the European Pilot Project)⁵ in the early and mid-1990s created a foundation for European cooperation between QA agencies, which subsequently led to the foundation of the European Network of Quality Assurance Agencies (ENQA). The founding of the ENQA received policy support from the EU when the Council offered its recommendation on 24 September 1998, calling on the member states to promote cooperation between the authorities responsible for quality assessment or assurance in higher education (Kristoffersson, 2010; Thune, 1998; European Council, 1998).

The ENQA was founded in 2000. It began as a network for QA organisations and received its funding from EU's Socrates Programme (Gornizka, 2009). Although it was initially a forum for the exchange of information and networking, the ENQA soon became an active contributor to the Bologna Process. In 2004, it changed its name to the European Association of Quality Assurance in Higher Education but kept the old 'ENQA' acronym (Ala-Vähälä & Saarinen, 2009). From 2000 to 2011, the ENQA secretariat was in Helsinki, moving to Brussels in

⁵ This project is discussed in Section 3.2.

2011, which was formally effected via the dissolution of the old ENQA and the establishment of a new organisation with the same name, only now located in Brussels.⁶ Although the ENQA represents QA agencies from the EHEA, it does not cover all the countries in the area—that is, it only covers 28 of the 48 EHEA countries.⁷ In addition to national organisations, the Institutional Evaluation Program (IEP) of the EUA is also a member of the ENQA.

The ENQA organises conferences, workshops, seminars, international QA projects and cooperation activities with stakeholders. The ENQA has also carried out several projects to clarify QA terminology (Crozier et al., 2006; Bruzoni et al., 2014) and has surveyed existing QA systems (Brusoni et al., 2014; Grifoll et al., 2012; Costes et al., 2008; ENQA, 2006; Hoffmann, 2006; ENQA, 2003; Hämäläinen et al., 2001b). Furthermore, it has held QA seminars and workshops in the EHEA (Amourgis et al., 2009; Bozo et al., 2009; Di Nauta et al., 2004; Hämäläinen et al., 2001a).

European University Association (EUA)

The EUA is an organisation of universities and national rectors' conferences from 47 European countries (eua.eu). It was founded in 2001 following the merger of two organisations—the European Conference for Rectors and Vice-Chancellors (CRE) and the Confederation of European Union Rectors' Conferences.

The Confederation of the European Union Rectors' Conferences was an organisation for universities in the EU area and its primary function was to represent them in the policy forums of the EU (Nyborg, 2014).

The history of the other organisation (i.e. CRE) dates back to the 1950s. Originally, the CRE was a forum for all European university rectors, although the participation of the rectors from the universities of the Eastern Bloc varied in accordance with general geopolitical developments.

From the 1970s onwards, the CRE supported university managers by educating and training them (Nyborg, 2014; Barblan, 2002). In 1993, the CRE established an assessment structure called the Institutional Evaluation Program (IEP).8 Its main aim was to support the member institutions in their response to the prospective challenges of assessment, accreditation and ranking. The second target was to help member institutions in former socialist countries reach the academic standards of education, as indicated in the Magna Charta Universitatum (van Ginkel, 2014). Rosa et al. (2011) state that the IEP's evaluations aim at supporting strategic planning and internal quality management.

Another line of activity that aimed to increase the autonomy of universities and their strategic leadership and management was a project called 'Quality Culture', which was carried out from 2002 to 2006. This initiative received financial support from the European Commission (Sursock, 2012, p. 255). The

⁸ Amaral (1998) gives detailed analysis of CRE's quality audits (see also Bochajczuk, 2014).

⁶ The email of the Deputy Director of the ENQA, Paula Ranne, to Timo Ala-Vähälä on 12 October 2016. In ENQA's 2011–2012 annual report, this process is called relocation (ENQA, 2012, p. 2.).

⁷ ENQA.eu (retrieved 20 March 2019).

main aims of the Quality Culture Project involved promoting internal quality management, disseminating the existing best practices in the field, helping institutions approach external procedures of QA constructively and contributing to the Bologna Process by widening the appeal of European higher education. The project reached 134 institutions from 36 European countries during its three rounds (EUA, 2006, pp. 6–7).

Governments

Individual countries participate in the Bologna Process via their education ministers. As stated above, the Bologna document is not a legal document in a strict sense. Therefore, member states have no legal obligations to implement the Bologna targets, although participating in the process requires reporting national development to the Process, which may incur 'soft pressure' from the community of EHEA members (the systems of reporting is discussed in Section 2.3). Despite the unifying pressures, governments may have different policy interests and this can lead to different national interpretations of the Bologna targets (Witte, 2009; Veiga & Amaral, 2006).

Some researchers claim that the pioneer governments that initially joined the Bologna Process established a European-level policy process in order to gain support to carry out their national policy agendas (Witte, 2009; Martens & Wolf, 2009). According to Martens and Wolf (2009), national governments may have been motivated to join the Bologna Process to strengthen their political capacities for carrying out policy reforms. At the same time, the Process gained momentum while reducing manoeuvrability and regulating the power of governments, which increased the role of the European Commission in higher education. Zahavi and Friedman (2019) support this idea by calling the Bologna Process a 'regime', mainly because the Process has gained a life of its own despite being a declaration of the signatory countries' intentions.

The content of the regime theory is further discussed in Section 4.4, while the Conclusions chapter discusses the adaptability of the regime theory to the topic of this study—that is, to diversity in higher education and its quality assurance and to European policy processes that have aimed at coping with it.

2.3 Bologna Process tools

Keeling (2006) provides a summary of the Bologna Process proceedings as follows:

The reform agenda is implemented in a decentralized way at the national level, but it is closely monitored and advanced by European-level reports, conferences, communiqués and policy declarations, which are all structured around a series of biennial ministerial meetings.

This citation reveals some of the main tools of the Bologna Process. The term 'tool' encompasses the systems and structures that support the implementation and monitoring of the Bologna Process commitments.

Some of the tools that this chapter discusses have been developed independently of the Bologna Process; however, at the same time, they have offered ways for managing the process and coping with the diversity of higher education in the EHEA. The first tool is the European Credit Transfer and Accumulation System (ECTS). It was introduced in the late 1980s to facilitate credit transfer in the Erasmus Programme. The second tool is the Diploma Supplement, which was developed by the European Commission, the Council of Europe and UNESCO-CEPES (European Centre for Higher Education) in the 1990s. This tool consists of a standardised template that contains a description of the nature, level, context, content and status of the studies and its primary goal is to promote transparency of study programs in European Higher Education. (Crozier & Parveva, 2013, pp. 37–40).

For this study, the most important tools are the systems that monitor the Bologna Process progress as well as the system of European-wide and national qualifications frameworks. Monitoring tools are essential because they create cohesion in the process and qualifications frameworks are relevant because they create common reference points to higher education. Section 3.3 discusses the role of qualifications frameworks as a way of creating common QA standards.⁹

The tools used to monitor the development of the Bologna Process consist of several types of reports, created partly by the organisations participating in the Bologna Process, ¹⁰ such as the national reports to the Bologna Process or those created by the BFUG. The first national reports on the progress of reforms concerning Bologna commitments were presented at the Berlin Conference (2003). They developed gradually, as the BFUG devised a template for delivering the data. During the Berlin Conference (2003), the ministers decided on the principles of systematic ways of following the progress of the process. They asked the BFUG to prepare a stocktaking report for the Bergen Conference of 2005. The report was partly based on national progress and covered topics such as QA, the two-cycle system, the recognition of degrees and periods of studies. The report presented a Bologna scorecard to give an overview of progress on the three priority action lines (Bologna Process, 2005); similar stocktaking reports were prepared for the Bologna 2007 and 2009 meetings.

After the establishment of the EHEA, the BFUG published three reports on the higher education situation in the EHEA (European Commission, 2018; EACEA, 2015; Eurydice, 2012). They describe the state of the Bologna Process implementation and provide statistical data and qualitative information. The

⁹ The BFUG lists four tools: standards and guidelines for QA, ECTS, qualifications frameworks and diploma supplement. The first tool on this list, standards and guidelines, is discussed in Section 3.3 (http://www.ehea.info/page-tools, visited 29 April 2019). ¹⁰ For example, trend reports by the EUA such as the 'Bologna with Student Eyes' by the European Student Information Bureau (ESIB). The European Commission normally provides funding for these reports.

scorecard indicators of the previous stocktaking reports were revised and integrated into the reports as Bologna indicators.

According to Ravinet, this system of reporting created a kind of naming and shaming mechanism of which the representatives of national governments were well aware. From 2005 onwards, the stocktaking reports that included the subject of QA made it even easier to compare how the member states had fulfilled their Bologna Process commitments. Ravinet concludes that the follow-up mechanism created a situation where a member country had to play according to the rules that the process and its follow-up mechanism had created.

The system of European-wide and national qualifications frameworks has been introduced as a tool for describing the distinctive features of all cycles and levels of education. Tauch (2004) states that during the first years of the Bologna Process, there was a shared understanding that the Bologna system needed descriptors, level indicators and qualifications frameworks because the creation of a standard bachelor and master degree system could hide significant differences in their educational level, content and practical applicability. Hence, the Berlin Conference of 2003 agreed to encourage member states to create national qualifications frameworks and overarching qualifications framework for the EHEA.

The Joint Quality Initiative project first presented a practical solution to a common framework for qualifications and it was carried out before the Berlin Conference. After the Bologna Declaration, Dutch and Flemish governments began to establish a common QA system and agency of De Nederlands-Vlaamse Accreditatieorganisatie [The Accreditation Organisation of the Netherlands and Flanders, NVAO]. Accordingly, they called on other countries with similar QA systems to contribute to the project, which led to the establishment of the Joint Quality Initiative. This process involved defining standards for bachelor and master level degrees, and the first versions of the Dublin Descriptors were defined in Dublin in 2002 (Leegwater, 2016; Joint Quality Initiative, 2004).

Only a few countries participated in the Joint Quality Initiative, which did not have any official status in the Bologna Process. Creating a system of qualifications framework began formally at the Berlin Conference of 2003, where ministers agreed to create a general framework of qualifications for the EHEA. The framework was intended to describe qualifications in terms of the level and workload of education, the expected learning outcomes and competencies and the educational profiles. The signatory countries also committed themselves to elaborate their national frameworks for qualifications, which would be compatible with the European-level framework by 2010. They also promised to initiate the development work by 2007 (Berlin Communiqué, 2003).

¹¹ There are two frameworks: the Qualifications Frameworks in the European Higher Education Area (QF-EHEA) and the European Framework for lifelong learning which covers all levels of education. They are mutually compatible but have different descriptors. Thus, countries need to take into account two European-level frameworks when developing their national frameworks for qualifications (Crosier & Parveva, 2013, pp. 37–42; also see European Parliament and European Council, 2008).

After the Berlin Communiqué, the BFUG established a working group to prepare a proposal for developing the system of the qualifications framework. The proposal accepted at the Bergen Conference of 2005 includes the Dublin Descriptors as descriptions of the three cycles of higher education (Bologna Working Group on Qualifications Frameworks, 2005, p. 57ff).

According to the approved document, a general framework for the EHEA qualifications is necessary for three reasons. First, it should help the Bologna Process create transparency between the existing systems of higher education by developing a shared basis for understanding different systems and their qualifications. Second, it should guide the countries developing their national frameworks. Third, it should provide a context for effective QA (Bologna Working Group on Qualifications Frameworks, 2005, p. 19).

In the London Communiqué of 2007, the Bologna Process countries committed themselves to implementing systems of national qualifications frameworks and to certifying them against the overarching Framework for Qualifications of the EHEA by 2010.¹² The process did not proceed as planned because the Yerevan Communiqué of 2012 acknowledged that the process of creating national qualifications frameworks was still in progress.

The Joint Quality Initiative and the European Qualifications Framework (EQF) focused on the 'vertical dimension' of higher education, defining the education levels and the outcomes and learning in generic terms without discussing disciplinary contents of specific educational fields. The learning targets for particular fields of education were elaborated on in another project—namely, the Tuning Educational Structures in Europe project. ¹³ It developed parallel to the Bologna Process, beginning its activities in 2000. Its main target was to support the planning of degree programmes in higher education. The reports produced by the Tuning Programme included statements on QA; however, they hardly discussed the practicalities of adapting qualifications frameworks to external QA (e.g. Tuning, 2003, pp. 50, 151, 164, 220–221; Tuning, 2005, pp. 179–180, 271; Tuning, 2008, p. 119ff).

The testing or piloting of the idea of joining qualifications frameworks and QA was carried out by the Transnational European Evaluation Project (TEEP). The TEEP was a pilot project that aimed at developing a method for transnational external evaluation of degree programmes in three fields of studies: history, physics and veterinary science (Christian Thune, in his foreword to the ENQA, 2004). The project report stated that TEEP's objectives involved developing a method for transnational external evaluation, building on previous experiences (e.g. the Tuning Project and Dublin Descriptors developed through the Joint Quality Initiative) and using standard criteria as the basis of an evaluation process in the three different disciplines (ENQA, 2004, p. 9).

According to the project report, the experts and programme representatives had difficulties in understanding and interpreting the criteria stated in the project

 $^{^{12}}$ Adelman (2009, p. 31ff) presents the national systems of qualifications in Ireland, Germany, Sweden, the Netherlands, France and the United Kingdom.

¹³ Terry (2008) gives a general survey of the Tuning Project (pp. 143-144).

manual, especially the descriptions of the competencies and learning outcomes (ENQA, 2004, p. 9). One of the conclusions of the project was that the criteria should be flexible in order to meet the wide diversity of the European systems of higher education (ibid., p. 31).

The lessons learnt from the TEEP project were later mentioned at the beginning of the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) of 2005 document, although it did not directly specify the problems that the TEEP project revealed. The role of qualifications frameworks and the experiences from the TEEP project are further discussed in Section 3.3, which analyses the different approaches for defining the standards for quality assurance.

¹⁴ 'In addition, the standards and guidelines owe much to the experience gained during the ENQA-coordinated pilot project "Transnational European Evaluation Project" (TEEP), which investigated, in three disciplines, the operational implications of a European transnational quality evaluation process' (ESG 2005, p. 12).

3 HIGHER EDUCATION QA

The following sections discuss the historical roots of QA (Section 3.1), the role of QA in the Bologna Process (Section 3.2), the policy alternatives for defining QA standards (Section 3.3), the process of establishing European-level QA structures in the EHEA (Section 3.4), the Finnish process of establishing QA systems that would meet the criteria stated in the Berlin Communiqué of 2003 (Section 3.5) and the tensions between the European-level and national-level policy interests (Section 3.6).

This paper, along with this chapter, argues that during the first decade of the Bologna Process, the EU overemphasised the role of common standards of education and QA to be used as reference standards; however, the European University Association (EUA) and its predecessor, the European Conference for Rectors and Vice-Chancellors (CRE), showed a greater tendency to support university management to meet their strategic targets and strive for excellence. Despite some overlaps in policy agendas, the policy documents of the EU tended to overemphasise quality control, whereas the EUA—and the CRE before it—focused on quality management. The tensions caused by different policy agendas are visible throughout the entire span of this study—that is, from about 1998/2000 to the publication of the second edition of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (2015) document. Another important topic of discussion is that the European Commission appears to have tried to loosen QA from national contexts, which may have caused tensions between national- and European-level policymaking.

3.1 Historical roots of higher education QA

Current QA systems originate in the United States and Europe. Considerable present QA practices in the United States can be traced to the accrediting bodies that the networks of educational institutions began establishing in the late 1800s. These accreditation bodies developed a combination of an institutional self-study

and visits of external experts who would prepare a report. These practices were subsequently applied to evaluations, too, although they have a history of their own. The evaluations have either been state-level programme evaluations, institutional evaluations or internal evaluations carried out by university management. The state-level evaluations in the United States were introduced and implemented in the 1980s when the state administrations began connecting assessment and accountability and using evaluations in resource allocation processes. At the same time, quality reviews became part of strategic planning at the institutional level, helping institutions define or refocus their targets. Already, during the 1970s, colleges had initiated student evaluations of their classes, which were included in the annual reviews of faculty teaching and research (Rhoades & Sporn, 2002; El-Khawas, 1998).

Dill et al. (1996) compare the accreditation, assessment and audit practices in higher education in the 1980s and 1990s. The analysis is based on the members of the International Network of Quality Assurance Agencies (INQAAHE) and covers national systems worldwide. Table 1 summarises the findings.

Table 1 The basic characteristics of accreditation, assessment and academic audit practices according to Dill et al. (1996)

	Accreditation	Assessment	Academic audit		
an institution or a programme meets		Evaluates specific activities (e.g. the quality of education or research)	Evaluates the processes that are believed to determine and guarantee quality		
The object or level of accreditation, assessment or audit	The performance of an institution or programme	Normally the performance of degree programmes or disciplinary subjects	Normally the audit focuses on formalities of internal QA		
Main criteria	Predefined, external, normally defined by the accreditation agency	Quality assessment relative to an institution's mission, not according to universal standards	Does not address academic standards but evaluates how an institution can meet academic standards		
Data used	Performance indicators, self- study, peer review	Performance indicators, self-study, peer review	Interviews, documents, 3–4 significant investigations from units that are supposed to be a representative sample of the institution		
The nature of the judgement	Binary (accepted, not accepted)	Graded judgments about academic quality levels			

-				
The organisation	External agency	External agency,	Externally driven	
that carries out		institutional	peer review of	
the process		consortium,	internal QA	
_		institutions	~	
		themselves		
Publicity	Results are public	Results are public,	Audit reports are	
		may include	public	
		comparisons between	_	
		institutions		
The cycle of	Normally 10 years	In the range of 5 to 10	Normally shorter	
accreditations,		years	than accreditations or	
assessments or		•	assessments	
audits				

To sum up, according to Dill et al. (1996), the main distinctive feature of accreditations is their binary nature in that the institutions either receive their accreditation or not. Assessments provide graded judgements of academic quality and, unlike accreditations and audits, they are carried out by several types of actors—namely, external agencies, institutional consortia and HEIs. The academic audit is an externally driven peer review of internal QA. Unlike accreditations and assessments, which are more performance oriented, academic audits evaluate processes that are expected to determine or guarantee high quality.

According to Dill et al. (1996), the concept of an academic audit was first developed in the mid-1980s in the United Kingdom (see Kis, 2006; Rhoades & Sporn, 2002). In the context of European higher education, Schwarz and Westerheijden (2004) claim that accreditation is a relatively new phenomenon. After the fall of communism in 1989, accreditation became the main QA instrument in higher education in central and eastern European countries, which were once part of the Eastern Bloc (Westerheijden, 2001). Although Dill et al. (1996) name audit as an element of internal quality assurance, it has become a form of external QA in the context of European QA (e.g. see Costes et al., 2008, pp. 23–24).

The internal management of quality in HEIs began to develop in the 1970s and 1980s in both Europe and the United States. Rhoades and Sporn (2002) and El-Khavas (1998) state that internal quality management came to the U.S. HEIs in the early 1990s in the form of variations on Total Quality Management. In addition, as early as the 1970s in Western Europe, the CRE and later the EUA had begun supporting university managers by providing various types of education in the field of higher education management. In 1993, the CRE established its Institutional Evaluation Program (IEP) to support university management in developing practices of quality management and institutional development while meeting the challenges of prospective external evaluations¹⁵ (Nyborg, 2014; Barblan, 2002). The CRE's IEP influenced the subsequent development of QA

¹⁵ Amaral (1998) gives detailed analysis of CRE's quality audits (see also Bochajczuk, 2014).

policies at the European level because the CRE's successor (i.e. the EUA) contributed to the development of European-level QA structures.

Although Dill et al. (1996) could clearly distinguish between accreditations, assessments and audits of quality, the subsequent developments in the Bologna Process countries reveal that the implementation of QA systems and their terminology has been a fuzzy totality (see Saarinen & Ala-Vähälä, 2007 and Sections 4.2 and 5.3). National QA systems in this study refer to the various mixtures of audits, accreditations and quality management that were developed in the 1990s and during the Bologna Process, having their historical roots in the developments presented above.

3.2 The role of QA in European higher education

In the 1990s, the European-level cooperation in QA developed independently from the development that preceded the Bologna Process; however, soon after the commencement of the Process, QA became an integral part of it. The Single European Act of 1987 states that 'the internal market shall comprise an area without frontiers in which the free movement of goods, persons, services and capital is ensured in accordance with the provisions of the Treaty'. According to Amaral (1998), this Act increased the need for mutual recognition of professional qualifications and proved to be challenging because of the vast diversity between various higher education systems among the member states.

In November 1991, on the initiative of the Dutch presidency, the Council of Ministers of Education agreed that the Commission should carry out a comparative study on the evaluation methods used in EU member states. Following this decision, the EU carried out several projects to evaluate the quality of higher education in some selected disciplines. This process, known as the European Pilot Project, included 46 institutions in the then 15 EU member states as well as Norway and Iceland (Amaral, 1998). When the projects were concluded in 1995, the participants showed a tendency to create a network for exchanging information and methodological developments, which, along with EU support, led to the establishment of the ENQA. An essential step in this process was the Council's recommendation for QA in higher education (European Council, 1998; Sursock, 2012; Kristoffersen, 2010; Thune, 1998).

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¹⁶ From 2004 onwards, the European Association of Quality Assurance (ENQA). ¹⁷ In its report on the implementation of the Council Recommendation of 1998, the European Commission states that the establishment of the ENQA was a direct result of the recommendation: 'The Recommendation laid the foundation for the creation of the ENQA Network, the European Network for Quality Assurance in Higher Education and its growing membership' (European Commission, 2004b). The individuals who were interviewed for the article on the ENQA development (Ala-Vähälä & Saarinen, 2009) overemphasised the internal development of cooperation between QA agencies and considered the Commission as an external source of funding.

The Council of Europe¹⁸ has also played a particular role in this process. During the Pan-European Lisbon Convention on the Recognition of Qualifications concerning Higher Education in the European Region of 1997, the signatory countries agreed that their respective authorities should be able to check whether degrees provided by another signatory country met the requirements of their own. In other words, the signatory countries agreed to announce their quality indicators (Council of Europe, 1997). According to Rauchwargers (2004), this agreement established a link between QA and mutual acceptance of academic degrees, although some of the signatory countries barely had an external QA mechanisms in place at that time.

The policy paper that was mentioned above, the Councils Recommendation for cooperation for QA in higher education (European Council, 1998) which later led to the establishment of the European Network of Quality Assurance (ENQA), included ten 'whereas' statements¹⁹ that discussed the significance of QA and cooperation in this field and, hence, these statements reveal the EU's main interests in the field of QA in higher education.

These statements illustrate that the EU connected QA to (a) higher education competitiveness and credibility in the evolving international markets of higher education, (b) HEIs' accountability to the state, (c) graduates' free movement in the EU area and (d) the impact of high-quality higher education on employment and economic growth. These ideas are stated as described below.

The first 'whereas' statement notes that the EU would follow the subsidiary principle:

High quality of education and training is an objective for all Member States; and the Community is called on to contribute to their ongoing efforts ... while fully respecting their responsibility for the content of teaching and the organization of education and training systems and their cultural and linguistic diversity.

Sentences 2 and 3 discussed the need of European level experience and cooperation of QA due to the diversity of national solutions; sentence 4 stated that member states were willing to exchange experiences and cooperate in this field in spite of differences in QA; sentence 5 stated that the term "higher education" meant in this context all education that were included in the Socrates programme, even if they were not named as higher education in the national context.

The sixth 'whereas' statement states that HEIs are required to meet the new educational and social requirements of a worldwide 'knowledge society' and resulting developments, including the growing number of students. The seventh statement calls for accountability because of the need to realign the relations between the states and universities in the context of global competition and massification of higher education as well as of respecting the existing academic standards and autonomy of the HEIs.

¹⁸ On the distinction between the Council of Europe and the European Council, see p. 19, footnote 4.

¹⁹ Before the recommendations, the Council's decision had ten sets of statements explaining the rationale of the recommendation. Each of them started with 'whereas', for example, 'Whereas a high quality of education and training is an objective for all Member States...'.

The eighth 'whereas' statement states that QA should contribute to the mutual recognition of academic or professional qualifications at the level of the European Community. In other words, QA should support the free movement of labour by assuring the quality of qualifications.

The ninth and tenth 'whereas' statements refer to previous EU policy papers and stress the importance of high-quality education for employment and growth within the Community and for addressing global competition. The tenth 'whereas' statement also states that encouraging mobility is one of the aims of Community cooperation in the fields of education and training. The provision of high-quality higher education enables individuals to compete internationally and take advantage of the freedom of movement within the Community.

Whereas the Bologna Declaration provides a general description of QA, the Prague Communiqué of 2001 stresses that the role of QA is to ensure that quality standards would be reached. It also perceives QA as a means of facilitating the comparability of qualifications in the EHEA. The Prague Communiqué also points out that 'quality was the basic underlying condition for trust, relevance, mobility, compatibility and attractiveness in the European Higher Education Area'. The Berlin Communiqué of 2003 states that 'the quality of higher education has proven to be at the heart of the setting up of a European Higher Education Area' and the Bucharest Communiqué of 2012 states that QA is essential for building trust and reinforcing the appeal of education in the EHEA.

A closer look at the Bologna Declaration and the communiqués of the biannual minister conferences illustrates the following four policy processes in the field of QA: (a) linking QA and educational qualifications, (b) creating comparable criteria and methodologies for QA, (c) increasing QA credibility for external stakeholders (including the establishment of the European Quality Assurance Register for Higher Education, EQAR, as a response to this challenge) and (d) enhancing mutual trust, exchange of information or mutual acceptance of accreditation or other QA decisions among the QA institutions in the EHEA.

The first issue—linking educational qualifications and QA—is mentioned as a policy target in the Prague Communiqué of 2002 only once.²⁰ It states that QA had a central role in facilitating the comparability of qualifications throughout Europe. The Joint Quality Initiative project first presented this idea, which was then further developed during the process of building qualifications framework system in the EHEA. The second issue—the need for mutually shared standards and/or methodologies—is mentioned in several communiqués (i.e. Bologna 1999, Berlin 2003, Bergen 2005 and Yerevan 2014). The primary outcome of this process is the ESG document, which was first approved in Bergen 2005.

The third issue concerns increasing QA credibility for external stakeholders and the idea of establishing a European registry for QA agencies. When the Berlin Communiqué of 2003 called on the ENQA—in cooperation with the EUA, the European Association of Institutions of Higher Education (EURASHE) and the European Student Information Bureau (ESIB)—to prepare a comprehensive

²⁰ Several communiqués mention the EQFs; however, only the Prague Communiqué links them to QA.

proposal for European QA standards, it also asked the E4 Group (i.e. ENQA, EUA, EURASHE and ESIB) to 'explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies'. This initiative initiated the planning of the EQAR agency, although the organisation is first mentioned in the Bergen Communiqué (2005). The London Conference in 2007 states that the purpose of the register was to allow all stakeholders and the general public to have open access to information about QA agencies. The Bucharest Communiqué of 2012 further states that the participants should 'commit to both maintaining the public responsibility for quality assurance and to actively involve a wide range of stakeholders in this development'.

The fourth policy process addressed mutual trust and cooperation in QA. The Bologna Declaration (2000) issues a general statement encouraging European cooperation in developing comparable QA criteria and methodologies. The Bergen Communiqué (2005) stresses the importance of cooperation between nationally recognised agencies in enhancing mutual recognition of accreditation or QA decisions. The London Communiqué (2007) repeats the idea of mutual recognition of accreditations and other QA decisions and international cooperation between QA agencies.

The Leuven/Louvain la Neuve Communiqué (2009) stresses the need for comparable criteria and enhancing mutual trust:

[The] transparency tools ... in particular quality assurance and recognition ... should be based on comparable data and adequate indicators to describe the diverse profiles of higher education institutions and their programmes.

Eventually, the Bucharest Communiqué of 2012 urges signatory countries to allow HEIs to use suitable EQAR-registered agencies for their external QA processes but requires respect for nationally-made decisions on QA principles.

Table 2 Statements about QA role or targets, as stated in the Bologna Declaration and the communiqués of ministerial conferences²¹

	Bologna 1999	Prague 2001	Berlin 2003	Bergen 2005	London 2007	Leuven, Louvain la Neuve 2009	Bucharest 2012	Yerevan 2014
Target A:		х						х
Linking QA								
and								
qualifications								
Target B:	x		X	X		x		x
Mutually								
shared								
standards,								
indicators								
and/or								
methodologies								

²¹ The Budapest-Vienna Declaration of 2010 is omitted from the table because it does not include any statements on QA.

Target C: QA credibility for stakeholders (European registry, peer review)		х	х	Х		х	
Target D: Cooperation, mutual trust between QA agencies, mutual acceptance of	х		х	х	х	х	
accreditation and other decisions							

To sum up, between 2003 and 2007, the ministers of the Bologna Process signatory countries committed themselves to two basic principles of internal and external QA, as follows: (a) there should be standards and guidelines for QA and (b) there should be a registry of QA agencies. These commitments were responses to the targets B and C presented in the Table 2.

The main commitment related to target D is the decision to allow the agencies of quality assurance to carry out their activities across the EHEA, which was accepted later on during the Yerevan Conference of 2014. The first target, target A (linking quality assurance and educational qualifications), has proceeded even more slowly and has also been an object of conflicting interests. This topic is discussed in the following section in particular.

3.3 QA on outcomes vs QA on processes and procedures

Section 2.3 presented the system of European Qualifications Frameworks. (EQF) as a tool for creating compatibility between national degree systems. This system has also been proposed as a reference system for external QA—in other words, QA should be linked to the learning outcomes that higher education is expected to provide to its students. However, an alternative way involves defining criteria for QA processes and procedures. The European University Association (EUA) presented this distinction and it is also mentioned in EU policy documents. This section argues that the EU has been the leading proponent of outcome-oriented standards for QA and that the EUA has supported the idea of a process-oriented alternative.

The first alternative—using the system of the European and national qualifications frameworks as references for QA—is suggested in the main planning documents of the EQF and in several EU policy documents.

In the Berlin Communiqué of 2003, the signatory countries committed to elaborate 'an overarching framework of qualifications for the European Higher

Education Area'. The working group that prepared the proposal offers the following suggestion:

Frameworks for higher education qualifications should explicitly link academic standards, national and institutional quality assurance systems, and public understanding of the place and level of nationally recognised qualifications. (Bologna Working Group on Qualifications Frameworks, 2005, p. 8.)

The document also states that cooperation in QA 'requires transparent and, if possible, common European approaches to the expression of qualifications, qualification descriptors and other external reference points for quality and standards' (Bologna Working Group on Qualifications Frameworks, 2005, p. 20). It also makes the following, stricter, statement:

Higher education frameworks of qualifications should explicitly link to academic standards, national and institutional quality assurance systems, and public understanding of the place and level of nationally recognised qualifications. (Bologna Working Group on Qualifications Frameworks, 2005, p. 55.)

In its attachment, which lists the national framework criteria, the document suggests that 'the national quality assurance system for higher education refers to the national framework of qualifications' (Bologna Working Group on Qualifications Frameworks, 2005, p. 80).

However, this document does not require a uniform system with strictly defined European- and national-level academic standards. It states that 'there is no precise pattern to the way that national frameworks of qualifications develop' (Bologna Working Group on Qualifications Frameworks, 2005, p. 35.) and 'there is no single model for the application of national frameworks of qualifications within quality assurance' (Bologna Working Group on Qualifications Frameworks, 2005, pp. 49–50). Nevertheless, this document displays a keen interest in linking qualifications frameworks and QA.

The European Commission supported the idea of linking qualifications frameworks and QA. The Commission published a document in 2004,²² stating that QA agencies should define and announce the standards they use as reference points in QA. These standards should be somewhat linked to the common European set of standards. According to the Commission, the system of reference points would increase the transparency and comparability of higher education in Europe. This kind of system would also help highlight the similarities and differences between study programmes without harmonising them (European Commission, 2004a, p. 3). Perhaps, in order to avoid the impression that the Commission is forcing universities to harmonise their provision of education, the document states that HEIs should be free 'to innovate and to go beyond what is described in the agreed set of standards' (European Commission, 2004a, p. 3).

The Commission further states that there are two ways for defining QA standards—as standards for QA mechanisms and standards related to learning

²² 'Quality assurance in higher education. Proposal for a Recommendation of the Council and of the European Parliament on further European Cooperation in Quality Assurance in Higher Education' (European Commission, 2004a).

outcomes and competencies. The Commission did not reject the first option; however, it overemphasised the second alternative – standards on outcomes. The concluding segment of the discussion suggests that the reference points would need to be updated regularly and kept in pace with emerging new knowledge and changing needs of society. The Commission also recommends stakeholder panels consisting of university academics, professionals, students and alumni, which would update the common European-level standards. This idea best suits a system of standards that focuses on educational outcomes (European Commission, 2004a, p. 3).

In 2008, the European Parliament and the European Council recommended establishing the EQF for lifelong learning at all levels of vocational education—a separate process of creating frameworks alongside the Bologna Process. The third annexe of this document offers its recommendations on the relationship between QA and vocational education, stressing the role of education outcomes: 'Quality assurance should include context, input, process and output dimensions, while giving emphasis to outputs and learning outcomes' (European Parliament and European Council, 2008, Annex III p. 111/7). As the EQF was strongly learning outcome-oriented, it is evident that this recommendation concerns the connection between qualifications frameworks and QA.

Despite the pressure from the Commission, the ESG document (ESG, 2005)—which defined the principles for internal and external quality work in higher education—follows the second option, focusing on the processes of QA.

As stated above, the chief proponent for this alternative was the EUA and its predecessor, the CRE. These organisations looked at QA from the perspective of universities or university management and also wanted QA to reveal the excellence of their member universities.

In its 2001 report, the CRE states that, due to the internationalisation of higher education, there is a need for protecting students moving abroad from 'rogue' providers of higher education. QA, therefore, assumed a type of consumer protection role in higher education markets, which was becoming increasingly transnational. According to the CRE, external QA processes should reveal the distinction between the institutions that meet higher education standards and players that enter higher education markets without adequate resources and expertise. At the same time, the CRE recommended that external QA processes (e.g. accreditation) should be considered to be a way of showcasing universities' high-level performances (CRE, 2001).

In the Salamanca Declaration of 2001, the EUA states that the European-level QA should not be based on a single agency enforcing a common set of standards (EUA, 2001, p. 8). EUA's Graz Declaration of 2003 stated that QA procedures must promote academic and organisational quality but, at the same time, must also respect institutional autonomy. It further states that the main target of a European QA dimension should involve promoting mutual trust and improving transparency, although it should also respect the diversity of national contexts and subject areas.

Before the Commission in 2003, already, the EUA had made the distinction between a standard that was either (a) a principle guiding the QA process or (b) a reference point or other criteria to be used for assessing the activities of HEIs.²³ The EUA supported the first alternative, stating that the process of setting up standards and guidelines aims at defining the common principles for the QA procedures. The EUA rejected the second alternative, saying that defining strict standards for higher education would threaten higher education diversity and innovativeness (EUA, 2003).

After the Graz Declaration, the EUA published a detailed policy statement on QA, commenting on the Berlin Communiqué and stating EUA's targets in an ESG document that, at the time, was under preparation. According to the EUA's statement, it is evident that the word 'standard', in the Berlin Communiqué, is open to interpretation—it could be referring to either QA procedures or HEIs. The EUA's standpoint was that the phrase 'standards, procedures and guidelines' refers to QA (EUA, 2004, p. 1). This distinction echoes Graz Declaration's distinction between the standards guiding QA processes and the standards as reference points for education.

The EUA participated in the group that prepared the ESG document and the 2004 statement was intended to contribute to the process of preparing the document. The ESG (2005) refer to EUA's policy position:

The standards and guidelines endorse the spirit of the July 2003 Graz Declaration of the European University Association (EUA) which states that the purpose of a European dimension to quality assurance is to promote mutual trust and improve transparency while respecting the diversity of national contexts and subject areas. (ESG, 2005, p. 12)

In addition to EUA's resistance, another motive for not linking the qualifications frameworks or other outcome-oriented systems of reference to quality assurance may have been the experiences of the TEEP-project, which tested (or piloted) the idea of joining qualifications frameworks and QA. The ESG of 2005 mention the TEEP, saying that the working group had studied the 'operational implications of a European transnational evaluation process'. Its first phase, TEEP I, focused on testing the idea of transnational QA in three educational fields (History, Physics, and Veterinary Science) in five or more European countries (ENQA, 2004). The second phase, TEEP II, focused on the QA of the transnational joint degree programmes (ENQA, 2006). The project report of TEEP I states that the objective of TEEP project was to develop a method for transnational external evaluation, building on experiences such as the Tuning Project and the Dublin Descriptors and using standard criteria as the basis of an evaluation process in three different disciplines (ENQA, 2004, p. 9).

According to the TEEP I project report, the experts and programme representatives had difficulties in understanding and interpreting the criteria stated in the project manual, especially the descriptions of competencies and

²³ When the Commission mentions the same distinction, it apparently refers to EUA's statements (see European Commission, 2004a).

learning outcomes. The report also states that some of the main challenges of the experiment involved interpreting the criteria in different national contexts (ENQA, 2004, p. 9). One of the conclusions of the project was that the criteria should be sufficiently flexible in order to meet the wide diversity of European higher education systems (ENQA, 2004, p. 31). Therefore, it would appear that, when the ESG of 2005 state that the working group had studied the 'operational implications of a European transnational evaluation process', it also says, between the lines, that the idea of linking qualifications frameworks and QA had been tested and was rejected because of the negative experiences.

To sum up, the ESG document (ESG, 2005) emphasises the value of diversity of higher education systems in Europe and does not require common standards for educational outcomes. It states that—due to diversity in political and higher education systems, cultural and educational traditions, languages, aspirations and expectations—it would not have been appropriate to create a single unified approach to QA in higher education (ESG, 2005, p. 10). Instead of defining the standards for activities or impacts of HEIs, the ESG (2005) focuses on the structures and procedures of internal and external QA.

After the first version of the ESG of 2005, the European Council and Commission published documents that repeated the idea of linking QA and qualifications frameworks—or ones that criticised the first version of the ESG—because it is missing this link.

In 2009, the European Council published a follow-up report on qualifications frameworks (Bologna Process Coordination Group for Qualifications Framework, 2009) and this document repeats the idea of linking qualifications frameworks and QA:

On the one hand, qualifications frameworks have little value unless higher education provision in the country concerned is quality assured ... Conversely, the national qualifications framework and the degree to which a given higher education institutions implement it should be a key factor in quality assurance exercises. This should include an assessment of its description and implementation of learning outcomes. (Bologna Process Coordination Group for Qualifications Framework, 2009, p. 26)

Five years later (2014), in a report on the development of QA in higher education, the European Commission criticises the ESG (2005), stating that the principles of the ESG were understood and applied in a variety of ways because of its generic nature. The Commission also criticises the ESG for not having links to the EQF (European Commission, 2009; see also Bollaert, 2014). A similar report from 2014 observes that the ESG of 2005 do not have any connection to some of the basic requirements of the EHEA, such as the Qualifications Framework that was under development at that time. The Commission's 2014 report criticises the 'criteria for processes, not for end results' principle and states that:

Quality assurance (QA) is often perceived as focusing on process rather than content. But QA still has untapped potential to support institutions in reaching their objectives. QA that is tailored to each HEI's vision and priorities will encourage greater diversity and specialisation of HEIs and promote wider engagement with and accountability to

stakeholders, systematically feeding results back into strategic decision-making, with an emphasis on continuous improvement. (European Commission, 2014, p. 4.)

According to the report, the Commission stresses 'the need for a thoroughgoing revision of the ESG that lays emphasis on raising quality standards rather than on procedural approaches'. In other words, it wants to change the underlying philosophy of the standards and guidelines (European Commission, 2014, p. 4).

After the Commission's January 2014 report, the European Council published its statement on QA and its role in supporting education across all levels of training in May 2014. Following the principles stated by the Commission, the European Council supports the revision of the ESG document, which was in progress at that time, and states that the ESG need to 'improve their clarity, applicability and usefulness, including their scope, laying emphasis on raising quality standards' (European Council, 2014, p. 31).

The European Council suggests that member states should give a more prominent role to the learning outcome-based approach in QA and base this process on the EQF. The Council also urges member states to use QA to strengthen the status of the national qualifications frameworks that were linked to the EQF. In other words, the Council stresses the role of the EQF in QA but, at the same time, hopes that this type of QA would strengthen the status of national qualifications frameworks (ibid.).

The Commission's assessment, published in January 2014, and the policy statement of the European Council, published in May 2014, may have impacted the new version of the ESG, especially the section that discusses the design and approval of educational programmes. While the ESG of 2005 state that 'institutions should have formal mechanisms for the approval, periodic review and monitoring of their programmes and awards', the new 2015 version states the following:

Institutions should have processes for the design and approval of their programmes; the programmes should be designed so that they meet the objectives set for them, including the intended learning outcomes. The qualification resulting from a programme should be clearly specified and communicated and refer to the correct level of the national qualifications framework for higher education and, consequently, to the Framework for Qualifications of the European Higher Education Area. (ESG, 2015, p. 11; underline by Ala-Vähälä)

However, this section of the new version of the ESG discusses the internal QA of HEIs. Thus, the new version of the ESG (2015) does not require direct use of the qualifications frameworks for external QA. Hence, it appears that the educational outcomes have found their place in ESG. The EQFs that focus on educational outcomes are included in the ESG in the section on internal QA; however, the rules for external QA focus on QA processes and structures.²⁴

²⁴ EQUIP (2016) provides systematic analysis of differences between ESG 2005 and 2015.

3.4 Creating the main European-level QA structures (2001–2007)

The previous chapter discussed ways of managing diversity in QA by setting reference levels for education and its assessment and by establishing standards and guidelines for QA. This chapter discusses the process of establishing European-level structures to assure outstanding QA in the EHEA countries.

During the Bologna Process, there were initially three main versions of structures that would enhance the credibility of external QA systems: (a) a system of mutual audits or accreditations of QA agencies, proposed by the ENQA; (b) a system of mutual assessments by QA agencies plus a European clearing house, coordinated by European universities and stakeholder organisations, proposed by the EUA and (c) a European registry of QA agencies, proposed by the EU. These three choices soon evolved into a model that comprised elements of all these alternatives, consisting of the European Quality Assurance Register for Higher Education (EQAR) and a system of mutual assessments of QA agencies.

The short presentation that follows argues that both the ENQA and EUA aimed at creating a European-level structure that would give a central position to the organisations that they represented (i.e. QA agencies or universities), whereas the EU appears to have strived for a structure (i.e. a registry of QA agencies) that would be independent from these two organisations. This chapter argues that the accepted model closely resonates the ideas that are suggested in EU's policy papers, although it includes elements of the ENQA and EUA models.

ENQA's model of mutual audits of QA agencies

Harvey (2004) claims that during the first years of the Bologna Process, the ENQA did not support the idea of a supranational QA agency. Its primary concern was to establish a system of mutual QA system recognition, with the main motivation being safeguarding the independence of agencies and QA procedures at all levels. According to Harvey (2004), ENQA's chair, Christian Thune, saw ENQA's role as a forum that could create an opportunity for appropriate mutual recognition to take place.

According to Thune's memoirs, the ENQA began to develop procedures for assessing QA agencies before the Berlin Conference of 2003. In February 2003, before EUA's Graz Conference in May 2003 and the Berlin Conference of the Bologna Process in September 2003, the ENQA arranged a workshop in Sitges, with the theme of 'taking our own medicine', to discuss the challenges of assessing the quality of QA agencies. The workshop aimed at defining the criteria for the quality of QA agencies and principles for independent, external evaluation. The stated intention was that the QA agencies would be subject to independent, external evaluation at fixed intervals. In Thune's opinion, this indicates that the ENQA was moving towards systematic QA of the agencies (Thune, 2010).

In its statement to the Berlin Conference, the ENQA accepted the idea of a register, which was, at that time, presented by both the EUA and the European Commission. In this statement, the ENQA stresses that it had already begun to

elaborate the principles that would guarantee the quality of its member agencies. These activities included new acceptance criteria for applicants and a requirement for member agencies to 'take their own medicine'—i.e. they should allow themselves to be evaluated by other agencies.

ENQA's target was for membership in the ENQA to be a sufficient criterion for being a recognised QA agency in the EHEA. In Thune's words, 'ENQA laid the groundwork for a possible later use of Network membership as a means of recognising higher education quality assurance' (Thune, 2010, p. 11). As Ala-Vähälä and Saarinen (2009) note, the ENQA did not reach the gatekeeper status—this role was given to the EQAR. However, ENQA membership was perceived as a sufficient qualification for being accepted to the registry.

In short, the ENQA initially strived for a lean and straightforward structure of mutual reviews of QA agencies and ENQA membership was seen as a guarantee of being a qualified agency; however, in the course of defining the ESG, the ENQA accepted the idea of a registry.

EUA's model of mutual audits/assessments and European clearing house

The EUA presented its version of assessments of QA agencies in the Salamanca Declaration of 2001. Just prior to that, the CRE (EUA's predecessor) had published a report about creating a system for validating the national systems of QA in the EHEA (CRE, 2001).

According to this CRE report, QA should protect students from unqualified providers of higher education; at the same time, it should help universities showcase their excellence. At that time, this CRE report suggests that accreditation is the main solution to both challenges and that, if there was no coordinated policy of QA at an international level, Europe would face a chaotic totality of QA systems, diminishing the transparency of the provision of education instead of increasing it (ibid.).

Based on this, the CRE proposes a European framework of QA, organised by universities and other stakeholders. The framework was intended to be a validation scheme for QA and accreditation procedures and not a new accreditation system at the European level (ibid.).

In 2001, the CRE merged with the Confederation of European Union Rectors' Conferences to establish the EUA. The EUA's first general policy document, the Salamanca Declaration of 2001, states that, at the European level, QA should not be based on a single agency enforcing a common set of standards. Instead, the EUA suggested that European countries should design mechanisms for the mutual acceptance of QA outcomes and that these European-level procedures should respect national, linguistic and discipline differences and not overload universities (EUA, 2001, p. 8).

The same idea is repeated in the EUA's Graz Declaration of 2003. According to the EUA, the main target of a European QA dimension should involve promoting mutual trust and improving transparency; however, it should simultaneously respect the diversity of national contexts and subject areas. The declaration further develops the principles of the Salamanca Declaration, proposing that stakeholders, especially universities, should collaborate in

establishing a provisional 'Higher Education Quality Committee for Europe'. The Declaration adds that this committee should be independent and respect the institutions' autonomy for quality, demonstrating responsiveness to public concerns. The EUA proposes that the committee provides a forum for discussion and nominates a board that would monitor the application of the proposed code of principles and contribute to the development of a European dimension in QA. In other words, there would be a European-level actor that would not only coordinate the mutual audits of QA agencies but also assure that the processes of meta-level QA would follow the aforementioned code of principles (EUA, 2003).

Commission's model of reviews of QA agencies and the European registry

The third version of the European structure—the European registry of QA agencies—was proposed by the European Commission in 2004. The Commission compiled its ideas in a proposal to submit to the Council and European Parliament about higher education QA.

The main idea of this proposition is similar to that of the EUA model, although it does not stress the role of universities. The Commission's proposal encourages the 'representatives of national authorities, the higher education sector and quality assurance and accreditation agencies, together with social partners, to set up a "European Register of Quality Assurance Agencies". The Commission's model includes the idea of reviews of QA agencies, although it does not explicitly state who would carry them out. The Commission states that there should be a system of reviews 'with checks and balances between the various stakeholders: universities, students, social partners and professional bodies, governments and agencies' (European Commission, 2004a).

The main ideas from the Commission's proposal were stated as policy decisions in a common recommendation of the European Council and Parliament in 2006—that is, after the Bergen Conference approved the idea of registry but before 2007 when the registry was founded. The recommendation repeats the principles of the registry that the Commission suggested; however, it also includes the principles of reviews of agencies, stating that membership in the registry should require regular external review by peers and other experts and that the criteria, methodologies and results of these reviews should be publicly available (European Parliament and European Council, 2006).²⁵

The E4 Group (i.e. ENQA, EUA, EURASHE and ESIB), which was given the task of preparing the proposal for standards and guidelines for QA and also the common European structures, recommends in their report that agencies in the EHEA should submit their practices to an external review at five-year intervals and that reviews should be carried out by other QA agencies. As for the registry, neither the EUA nor the ENQA is given a prominent role in this structure—the working group proposes a separate, new registry, thus mostly following the principles stated by the European Commission.

²⁵ The European Parliament had stated this principle in October 2005, which is about five months after the Bergen Conference of the Bologna Process (European Parliament, 2005).

The European Quality Assurance Registry (EQAR) was founded in 2007. In 2008, the General Assembly of the Registry defined inclusion criteria whereby applicants needed to demonstrate that their operations complied with the principles stated in the ESG and this had to be verified via an external review; however, full membership to the ENQA would, by default, verify that the agency followed these principles. According to the application procedures of 2008, the external review was to be carried out by an independent expert panel coordinated by a national authority or another organisation that had the requisite professional capacity. The Register Committee had the right to verify each case and whether the review coordinator had the required professional capacity (EQAR, 2008).

The EQAR is defined as 'an international non-profit association under Belgian law, founded by the E4 Group'—in other words, the EQAR was founded by organisations that prepared the proposal for the registry. The EQAR has a General Assembly that consists of the founding members, some stakeholder organisations (social partners) and the signatory countries of the Bologna Process. The General Assembly selects the executive board and the register committee and appeals committee, for example (EQAR, 2017).

Although the EUA and the ENQA represent the universities and QA agencies in the EQAR administration, it is reasonable to assume that the final structure is quite different from the agency-driven system that the ENQA initially proposed and the university-driven system that the EUA preferred. The registry that was established in 2007 closely meets the policy targets that the Commission and the European Parliament, as well as the Parliament and Council together, presented in 2004, 2005 and 2006. The Commission's proposal of 2004 (European Commission, 2004a) states the basic principles that might have had the most significant impact on the process because it was published before the Bergen Conference of 2005, where the basic decisions were made.

In 2009, the Commission assessed the QA situation at that time—and the document subsequently released gives additional information on the Commission's policy interests. Here, the Commission recommends establishing a clear division of roles and tasks between the ENQA, EQAR and the European Consortium for Accreditation and basing the division of roles on the interests of potential QA beneficiaries. The approved version of the registry is the model that loosened the connections between the registry and the two important actors of the Bologna Process (i.e. the EUA and ENQA). In this sense, the approved model perfectly met the Commission's interests (European Commission 2009.)

3.5 Putting into practice the QA commitments of the Bologna Process: The case of Finland

Finland presents a case that shows how the Bologna-level commitments were translated into national policy decisions, what the motivations for policy choice

were and what kind of reception the new QA structures received from higher education personnel.

The process of establishing new QA systems in Finland was simultaneously carried out alongside several other reforms, such as moving from collegial systems of decision-making in universities towards managerial systems, establishing new systems for funding higher education and research, promoting mergers and other structural developments and introducing a new system of higher education degrees that would meet the Bologna commitments (see Ursin, 2019; on mergers, see Nokkala et al., 2016; on the introduction of performance-based steering in science and higher education, see Pelkonen et al., 2008). When this study discusses the reception of new QA systems later on, it is crucial to remember that they were introduced against the backdrop of a broad range of other reforms or development processes and that the context of several concurrent reforms may have had a significant impact on (a) the national interpretation of Bologna commitments (cf. Witte, 2009, 2006) and (b) the reception of the introduced QA systems among higher education personnel.

As Ala-Vähälä and Saarinen (2013) state, in Finland, the national response to the Berlin Communiqué's requirement of accreditation, certification or comparable procedures were audits of QA systems. The system that was created is still in use at the time of this study, although each round of audits has had its peculiarities. According to the audit manuals, the fundamental responsibility of quality is the prerogative of HEIs and audits ensure that quality work and QA systems work well. Audits do not lead to sanctions and they do not take a stand on the output of education, although the system requires that HEIs take responsibility for evaluating their performance.

If a higher education institution does not meet the required standards, it is necessary to identify the items that have failed to do so and to request a re-audit, although there are no direct sanctions. However, the task force that produced the report and defined the system of audits stated that ministry of education might take into consideration the audit results during the process of setting targets and assessing the performance outcomes of the HEIs (Ala-Vähälä & Saarinen, 2013; OPM, 2004, p. 38).

A comparison between these principles and policy targets and the interests at the European level presented in the previous chapters illustrates that the Finnish model of external QA does not focus on outcomes—and neither does it link QA to qualifications frameworks. The Finnish Higher Education Evaluation Council's (FINHEEC's) audit manual had, for the 2005–2007 period, strongly linked quality work to university management by stating that 'quality assurance forms part of management, strategic work and internal performance management in HEIs' (FINHEEC, 2006, preface). Thus, it was (and is) intended to support the management and strategic planning of HEIs, following the principles stated in the EUA's policy papers of that time.

However, this does not mean that the chosen system is replicated from the EUA's policy documents: its elements were developed during the previous

decade and several subsequent policy practices enhanced the development of the new system prior to its actual implementation.

Since the mid-1990s, Finland has had a dual system of higher education, consisting of universities of applied sciences (UAS), which were established by merging post-secondary vocational education units and universities that provide bachelor, master and doctoral levels of education as well as carry out scientific research. Both the UAS and universities also provide education in arts and design. It appears that the UAS became familiar with the new modes of quality work earlier than traditional universities.

At the universities of applied sciences (UAS), FINHEEC carried out several audit-like processes since the late 1990s that assessed the management, planning and provision of education. These included the processes of accepting the operating licences (audited by FINHEEC, approved by the Ministry of Education) and giving them the right to provide master-level education; there were also some small-scale audits of quality work at the universities of applied sciences. Among the universities, the process of establishing QA systems began some years later, although they had been subject to evaluations since the mid-1990s (Ala-Vähälä & Saarinen, 2013). The report of the task force that prepared the proposition for the system of audits claims that the UAS had proceeded further in their quality work than universities. Although some universities had QA systems and all had some elements of quality work, they were not been developed to a systematic level and their descriptions were difficult to understand (OPM, 2004, pp. 17–18).

In 1999–2000, ²⁶ the Finnish Council of University Rectors carried out a project that surveyed university rectors' views about QA, the status of quality work in their universities as well as its coordination and cooperation at the national level. The interviews and the summary of the project report show that the level and nature of quality work varied among the research universities (Sotamaa & Sohlo, 2000; Sohlo, 2000, p. 155); however, at the same time, the report also indicates that the rectors of the universities were aware of the future QA challenges. The foreword of the report states that universities, as organisations, needed systematic quality work to identify the issues that can impact the quality of their activities, to critically assess their activities and efficiency and to identify the areas that require improvement. The report also does not consider individual improvement projects to be adequate and adds that universities needed systematic assessment and quality improvement that covers all parts of the organisation (Sotamaa & Sohlo, 2000).

However, the interviews and the summary of the project report indicate that university rectors were reluctant to transition to a system where some organisation would centrally manage the quality work in universities (Sohlo, 2000, p. 155). This opinion is also expressed in a report by a task force that discussed the development of a system of performance-based steering of research universities. The report states that feedback from university leaders showed

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²⁶ The project was launched in the spring of 1999, slightly before the Bologna Declaration, which was signed in June 1999.

there was no need for centralised coordination of internal QA systems of research universities (OPM, 2002, p. 13).

On the other hand, there appears to have been administrative pressures for establishing the QA systems. The 2004–2006 performance agreements between the Ministry of Education and universities state that 'universities will continue to develop all-encompassing quality work and its methods'. The 2004 agreements were signed in late 2003. In other words, the Ministry already expected systematic quality work from universities before it assigned a task force that later defined the new QA principles. Thus, the internal quality work of universities began developing partly via universities' own initiatives and partly because of the demand from the Ministry of Education.

Furthermore, the idea of auditing the QA systems of HEIs was presented before the task group that created the Finnish model of audits. In March 2003, the FINHEEC published a book titled 'Laatua ammattikorkeakouluihin' ('Quality for the universities of applied sciences') in which the general secretary of FINHEEC (and later the general secretary of the task force), Tapio Huttula, presented an article on QA. In this article, Huttula sketches some basic ideas of external QA that later on proved to be a seminal form of the model that the task force suggested. Huttula lists three alternatives for developing the national QA system: (a) continuing the activities that had been developed to date, (b) focusing on degree programmes evaluations and (c) something new. For the third alternative, Huttula suggests an auditing system of quality work or QA. The HEIs would be responsible for developing QA systems (and their targets) independently and the FINHEEC would then audit these systems. According to Huttula, this practice was already in use in England, Australia, New Zealand and Norway (Huttula, 2003, p. 132).

The Finnish system of audits was defined by a working group consisting of representatives from the Ministry of Education, the National Union of Finnish Students, the FINHEEC and the UAS Students in Finland. The group also included one university rector and one UAS representative. The general secretary of the working group, Tapio Huttula, came from the FINHEEC, while the other members of the secretariat came mainly from the Finnish Higher Education Evaluation Council as well as, partly, from the Ministry of Education (OPM, 2004, cover letter).

The members of the task force had several links to international forums in the field of QA: the FINHEEC was a member of the ENQA and the ENQA had its headquarters in Helsinki (Finland) at that time. ²⁷ The Ministry of Education contributed to the Bologna Process and was responsible for implementing the agreed commitments in Finland. Some of the members or secretaries of the task force, who came from the Ministry of Education, had also participated in the task force that discussed the results-based management of universities. Thus, the

²⁷ The report of the task force that prepared the Finnish version of QA states that the ENQA had a central role in preparing the ESG. The task force heard ENQA's coordinator at that time, Kimmo Hämäläinen (OPM, 2004, cover letter, p. 38).

members of the task force were well networked both nationally and at the European level, although none of them represented the HEI personnel groups.

The report of the task force that prepared the national model of audits mentions several international trends that challenged the existing system of higher education and calls for new systems of internal and external QA. Among the trends mentioned are the commercialisation of higher education (i.e. new private providers of education, especially in the countries of the former Eastern Bloc), the introduction of tuition fees, the increased international cooperation between HEIs, the international mobility of students and the transnational provision of education (joint degrees, universities having branch units in several countries) (OPM, 2004, pp. 30–31).

The report also mentions the internal development of HEIs and the changes in their relations to the government: the changes in the management systems of higher education, the reforms that aimed at increasing effectiveness and efficiency and the increased demands on accountability—were all linked to the increased autonomy of HEIs (ibid., p. 31). The motivation for QA reveals the same division of interests presented at the beginning of Chapter 3: some incentives asked for quality control and others for better quality management.

According to the task force report, the external evaluation practices of that time (i.e. evaluations of degree programmes or study fields) did not meet the requirements of the Berlin Communiqué of 2003. At the same time, the task force was not willing to establish a system of accreditation, which—in its opinion—would have checked only the required minimum level of education. The task force preferred a model in which HEIs would have the central responsibility for quality work—a continuous improvement of quality—and external QA would consist of general principles of quality work and audits of QA systems (ibid., pp. 36–40).

The report assesses that accreditations would be a difficult and costly procedure. On a more principled level, it states that the Finnish government had decided to establish new HEIs or degree programmes and that, hence, it also had the responsibility to guarantee the minimum level of education. In other words, choosing the system of accreditations would have reduced the power of the Ministry of Education to decide on the provision of higher education.

The report motivates the rejection of accreditation also because of the feedback that the task force had received from HEIs during a seminar in October 2003,²⁸ which discussed the European-level challenges of QA. According to the task force, HEIs were ready to create QA systems that would meet the European and international standards; however, HEIs were unwilling to transition from improvement-oriented evaluations to a system of accreditations (OPM, 2004, pp. 34–35).

In summary, the documents presented above indicate that universities and UAS had already begun to create their QA structures prior to the establishment of the system of audits, although some universities were still in the early stages

²⁸ The European dimension of QA in higher education and Finland (October 29–30, 2003, Helsinki, Finland).

of the process. Based on the interviews that Ala-Vähälä carried out in 2009–2010, the UAS interviewees often considered that their quality work had begun in the late 1990s, when these institutions had applied their operating licenses, whereas the interviewees from universities thought that the introduction of auditing QA systems was the primary rationale for establishing the respective systems (Ala-Vähälä, 2011, pp. 24–25).

In addition, some audit-like processes were later piloted in UAS. Furthermore, the idea of auditing QA systems was proposed before the task force began its work. Research universities were more reluctant than UAS to proceed in this direction.

3.6 QA at the European level vs. QA at the national level

Chapter 3.4 argued that there are two main ways of defining the standards of quality assurance: either by defining the criteria for the outcomes of higher education—qualifications frameworks—or by defining standards for the processes and procedures of quality assurance. The European Commission has been the main proponent of the first alternative and the European University Association (EUA) of the second alternative. However, these alternatives are not mutually exclusive even though there has been tension between them.

The second line of coping with diversity in quality assurance has been to create European-level structures that would guarantee the credibility of national quality assurance. The ENQA and EUA policy documents indicate that these organisations prefer a system that would be supported by their respective member organisations, whereas the Commission proposes a system that would be independent from stakeholder organisations. The end result—European Quality Assurance Registry—follows, albeit with slight adjustments, the Commission's proposal.

In addition to the policy processes that led to the establishment of the European Quality Assurance Registry (EQAR), there is still one interesting policy goal, promoted mainly by the European Commission—de-nationalising the processes of quality assurance or loosening the agencies of quality assurance from their national contexts. This policy goal has not led to similar results as defining common standards or setting up a European registry has, however, there are some policy documents that reveal the Commission's interest in loosening the link between QA agencies and state borders.

The first indication of this policy goal is the idea of allowing higher education institutions to invite agencies from other EHEA countries, as long as they follow the national rules that apply to the higher education institution in question. The Commission's 2004 proposal for a recommendation of the Council and of the European Parliament already suggests that the member countries should allow their higher education institutions to choose foreign quality assurance or accreditation agencies found in the European Register (European Commission, 2004). The Council and the European Parliament state this principle

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in their recommendation of 2006 (European Parliament and Council, 2006). This statement is interesting because the Commission, the European Parliament and the Council had also expressed this idea several years before the Bologna Process. The Bologna Process countries state the same principle found in this statement in the Yerevan Communiqué six years later (see also Sursock, 2012).

The second element is the target of simplifying the structures of European-level quality assurance, defining the roles of each organisation in this field and creating bigger units of quality assurance that would cower similar cultural or linguistic areas over national borders. According to the Commission's assessment of 2009, there are two main problems in the structures of quality assurance. The first problem is that some national units of quality assurance may be too small to meet the standards of transparency and credibility. The second problem lies in the multiple layers of agencies and networks at the European level of quality assurance. As a solution to the first problem, the report recommends that small regionally or linguistically close agencies should merge with one another. For the second problem, the report recommends establishing a clear division of roles and tasks between the ENQA, EQAR and the European Consortium for Accreditation (ECA), as well as for this division of roles to be based on the interests of those who are the potential beneficiaries of quality assurance (European Commission, 2009).

The Commission's assessment of 2014 is more moderate in its recommendations. It does not repeat the idea of merging small quality assurance agencies over national borders but it does criticise the governments that tended to work with their own agencies even though they had agreed to allow gross-border activities in the field of quality assurance in the Yerevan Communiqué. This indicates that the Commission has slightly withdrawn from its target of getting larger trans-national agencies but that it still supports a system in which there would be a common European area quality assurance services, where the universities could freely choose their auditor, accreditation organisation or other quality assurance services (European Commission, 2014).

The Finnish QA system was established to meet the requirements stated in the Berlin Communiqué of 2003 and, presumably, it was intended to meet the requirements that were anticipated in the ESG, which was being planned at that time. However, as stated in the previous section (3.5), the Finnish solution strongly reflects its national interests—it does not challenge the authority of the government when deciding on the provision of education and it refines the practices that the Finnish QA agency had developed since the mid-1990s with the universities of applied sciences.

In the context of the European-level Bologna Process, QA was linked to the processes aimed at creating common structures for education, enhancing free movement of students, scholars and graduates and guaranteeing quality education. In the national context of Finland, quality work was strongly linked to strategic work and internal performance management. In other words, the Finnish choice loosened the link to the original targets stated in policy discussions during the first years of the Bologna Process and linked that reform

to other reforms that were being implemented at that time. Witte's (2009) conclusions also indicate that curricular governance reforms in European countries inclined towards national policy agendas rather than the comparability of the European QA system.

The Commission's tendency to prefer policy targets that would loosen links between national governments and external quality assurance and — on the other hand — the governments' interests to back their national agendas with Bologna commitments indicate that there has been permanent tension between European-level and national-level policy targets. This topic is further discussed in the following chapters, especially in Sections 4.3 and 5.3 and the Conclusion chapter.

4 DIVERSITY AND COHESIVE FORCES IN HIGHER EDUCATION AND ITS QA

The two previous chapters presented the historical roots of the Bologna Process, its main contributors, structures and ways of working (Chapter 2), as well as the historical roots of QA and its introduction to the Bologna Process (Sections 3.1, 3.2, 3.3 and 3.4), the national case of Finland and the process of establishing a QA system that would meet the Bologna Process commitments (Section 3.5) and tensions between European- and national-level policy targets (Section 3.6). This chapter presents previous research and other reports that discuss (a) diversity and conceptual and terminological fuzziness in the field of higher education and QA, (b) factors that may enforce the development towards more diverse or uniform systems and (c) theories or frameworks of governance that assist in understanding the policy processes that this study focuses on.

This chapter does not intend to state that diversity and cohesion are contradictory or mutually exclusive nor does it try to explain the history and various definitions of social cohesion. The main target of this chapter is to present the various ways in which diversity and terminological and conceptual fuzziness have been discussed in the literature.

Instead of trying to create a theoretical synthesis of the topic, this chapter presents various points of view used in previous studies. As the chapter shows, several studies exist on discursive practices and other factors that create cohesive forces for the Bologna Process and create a shared understanding of QA. There are also studies on the convergence and diversification in QA and the role of the EU, especially the Commission, in the Bologna Process. However, the policy processes that aim at coping with diversity and related fuzziness have not thus far been the subject of systematic analysis, which is the focus of this study.

This chapter discusses the nature of diversity and fuzziness in higher education and QA, unifying the forces within the field of higher education and the role of the European Union in this process as follows:

Section 4.1 discusses the differences between the national systems of higher education and the massification of higher education as well as its impact on the (internal) diversification of higher education.

Section 4.2 presents research and other reports that discuss QA diversity in the EHEA.

Section 4.3 discusses studies on discursive practices that intend to create shared ways of speaking about quality.

Section 4.4 discusses three theories or conceptual frameworks that research literature links to the Bologna Process and that are relevant from the point of view of diversity.

4.1 Diversity in higher education

In his *Higher Education System* (1983), Burton Clark discusses the topics of integrative forces—the forces that cause internal differentiation of higher education, differences between national higher education systems and different ways of looking at or defining higher education.

One of the basic distinctions that Clark (1983) presents is between different ways of looking at higher education. Clark differentiates between university as an enterprise and as a discipline. From a manager or administrator's point of view, higher education consists of organisational units that Clark calls 'enterprises', while, from a scholar's point of view, he/she is a member of a community in a certain field of science or in a discipline that spreads across organisational and national frontiers (Clark, 1983, pp. 17–18, 28–34). Clark's distinction between university as an enterprise versus a discipline is also visible in QA because both accreditations and evaluations have usually either been based on institutions or on disciplines or professions.

According to Clark, universities and systems of higher education are subjects of continuous differentiation: horizontal differentiation, as the expansion of knowledge distances disciplines from one another and creates new ones; and vertical differentiation, as various types of hierarchy tend to emerge. In addition, the expansion of student population, the increasing variety of their needs and the widening of the labour market force higher education systems to provide more diverse types of educational programmes (Clark, 1983, pp. 14–16, 215).

As the higher education system grows and becomes 'loaded with more activities', this leads to sectoral differentiation — to a higher education system that has several sectors of education, each with its own institutions and specific relations with the government depending on the sector. Based on the nature of sectoral divisions, Clark divides the academic systems into four types: (a) nations with one unified public system of higher education, (b) nations where higher education is provided by two or more separate sectors (e.g. university and non-university sectors), (c) nations with multiple public systems and multiple sectors and (d) nations where higher education provision consists of private and public systems as well as multiple sectors of higher education (Clark, 1983, pp. 53–62).

In these circumstances, what does integrate the complex systems of higher education? Clark defines three main forces of integration in higher education. In

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the course of internal differentiation of higher education, there evolves three main forces or actors that create order for higher education: the academic community, the state bureaucracy and market. In each country, these integrating forces have their own role in higher education or, according to Clark, every national system of higher education has its own place in a triangle, where each corner represents one of the three forces of integration. In Clark's analysis, the United States is an example of a market-oriented system of higher education, Italy of a system in which academic oligarchy has a strong power position and the former Soviet Union of a system in which the state plays a central role.

Cantwell et al. (2018c) emphasise the relevance of Clark's distinction but, at the same time, also mention some problems. For example, because of massification, systems are too complex to fit Clark's triangle: public administration consists of several layers or segments with potentially different interests and higher education systems may simultaneously absorb elements resulting from markets and governmental steering.

Despite this criticism, Clark's division and subsequent critical discussion help in understanding some aspects of diversity in QA practices. Each country or area has its specific higher education system and own history of developing relations between HEIs, government, labour markets, students and other stakeholders. Hence, it is reasonable to expect that national peculiarities also have some impact on the development of QA systems. This is supported by Witte's article (2009), which states that national system reforms have mostly been determined by the history and the policy contexts of national higher education systems. Thus, it is reasonable to expect differences in the sectoral division of higher education, the university-government relations, the role of state bureaucracy and the market mechanisms of higher education to influence the development of QA systems.

According to Trow (1973), the massification of universities has had several impacts on higher education—namely, on the work of academic personnel and administration. It has increased the workload of the academic and administrative personnel and created a more complex work environment. At the policy level, the relation of higher education to the state has become an important policy issue, comparable to other fields of administration. In tandem with the increase in student population, the diversity of student population has also increased. This applies to their social origins, motivations, aspirations, interests and working careers. Furthermore, the provision of education has transcended traditional limits—from education that provides an entrance into the labour market to lifelong education; from classrooms or other university facilities to distance and work education that brings education to people in their own homes or workplaces; from small units of higher education having high standards and guaranteeing career in civil service to education that has diverse standards and meets various professional or other targets.

Although Trow (1973) mentions that massification changes the relations between universities and governments and increases the role of higher education in policymaking, subsequent research emphasises this aspect even more. As an example, according to Enders and De Boer (2009), one of the main impacts of higher education massification has been the strong integration of universities into state bureaucracy. At the same time, science has become an important separate sector in national policymaking. In addition to higher education diversification, there has also been diversification in the field of science—the rise of 'big science' has led to large-scale research facilities and big budgets, which has created a need for specialisation and cooperation, leading to the concentration of resources, infrastructures and researchers (Enders & De Boer, 2009).

Several passages of the book, *High Participation Systems in Higher Education* (Cantwell et al., 2018a), state that one of the fundamental consequences of massification is the restructuration of university management, both internally and externally, with HEIs, government and external stakeholders. Cantwell et al. (2018c) state that higher education with high participation systems (HPS) is now subject to multi-level control, coordination and accountability mechanisms.

Following Trow and Clark, Enders and De Boer (2009) note that, since the 1970s, higher education massification has also impacted the relationship between education and labour markets—because of the growing number of highly educated applicants, higher education is no longer a guarantee that a future career will match the given education. In the course of this development, the occupational structures have also become more mobile. At the same time, the student body has become more heterogeneous in terms of age, social background, levels of preparation, differential working career phase, etc. Previously, the main task of universities was to supply labour markets with a qualified workforce; in subsequent years, the task came to involve supporting people throughout their working careers.

According to Clark's model, higher education massification has led to internal differentiation of HEIs. On the other hand, the massification of or HPS in higher education may also be a unifying force in higher education. When governments intervene in higher education, they may be following similar ideologies or policy models (e.g. New Public Management and elements of quasimarkets) (Cantwell et al., 2018b). In addition, the globalisation of higher education can have a unifying impact when universities establish new branches in foreign countries and the lesser-known universities imitate successful ones (Marginson, 2018, referring to isomorphic tendencies). The massification adaption process follows some quite uniform patterns, such as mergers of small universities with big conglomerates and multiversities, which are internally diversified but have quite a similar general shape (Cantwell et al., 2018b).

This trend means that massification includes simultaneous unifying and diversifying tendencies—small universities tend to merge with bigger units that become internally diversified but follow similar patterns in their general structure. In many countries—the Scandinavian countries being somewhat of an exception—the high rate of participation has also led to the stratification of the higher education systems of some elite universities and to a higher number of

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other universities that provide education to a larger mass of students (Cantwell & Marginson, 2018; Pinheiro & Stensaker, 2018; Välimaa & Muhonen, 2018).

Witte (2006) discusses diversity in higher education against the backdrop of the national reforms related to the Bologna Process. According to Witte (2006, pp. 13–18), the literature on diversity in higher education systems reveals a high degree of diversity both between and within countries. Like Trow and Clark, Witte concludes that the main reason for internal diversity is the fact that higher education has to provide education to growing and diverse student populations, has to respond to changing and diversifying labour market needs and new societal demands and has to adapt to the continuously growing and differentiating mass of academic knowledge. According to Witte (2006), this renders higher education 'messy and ambiguous' even when governments try to regulate it. Hence, in this author's opinion, the European-level framework for higher education has to embrace the internal diversity of national systems, and the European system cannot be less complicated than the national systems.

4.2 Diversity and fuzziness in QA

Several research articles and reports discuss various forms of diversity and the terminological and conceptual fuzziness in QA. Some of these focus on the situation in the first years of the Bologna process and others analyse the impact of the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) on QA diversity. The main conclusion appears to be that the Bologna Process and the introduction of the ESG have created some amount of isomorphism concerning QA, although they have introduced new types of fuzziness into it at the same time.

Schwarz and Westerheijden (2004) state that higher education evaluations had (at the time of writing the article) a common approach in Europe despite vast diversity in accreditation systems. Some accreditation organisations carried out institutional accreditations, whereas others focused on specific professional fields; while some countries had independent accreditation agencies, some had devolved the task of accreditation to the ministry of higher education. According to the Schwarz and Westerheijden (2004), there were no methods for comparing the accreditation schemes and evaluation procedures.

Saarinen (2008b) discusses the discursive spaces that various actors have had around 'quality' in the Bologna Process and other European and international forums. One of her conclusions is that the global QA policy issues were re-contextualised when they came to the national level. For example, government documentation included some stakeholders and excluded others (e.g. students and/or university staff). In the case of Finland, the Ministry of Education appears to have sent different messages to international (e.g. the Bologna members) and national audiences. For national audiences, it emphasised the role of students and universities while stressing its own role for the international audiences—this indicates that the process of translating

international commitments into national policy includes elements of elliptical and/or fuzzy information.

The terminological and conceptual diversity of QA among the Bologna Process countries and the ENQA member states is also discussed in several non-academic reports and articles. In *Quality Procedures in European Higher Education*, the ENQA states that the term 'accreditation' is ambiguous. The report analyses various accreditation processes and concludes that accreditation is often confused with evaluation (ENQA, 2003b, p. 19). The EUA's Trends report of 2003 states that, in the context of higher education in Europe, 'accreditation is yet another term which is commonly used but associated with different procedures in different countries' (Reichert & Tauch, 2003, p. 81).

ENQA's quality convergence study (Crozier et al., 2005) states that the self-assessment reports written by QA agencies used the terms accreditation, evaluation and assessment in their own way and that the precise meanings of these terms varied depending on each national context. ENQA's report on QA terminology (Crozier et al., 2006, p. 6) reminds of the subjectivity and social construction of ideas related to QA. The report states that QA activities are carried out by individuals who act in their own cultural and linguistic contexts, which has an impact on everything they do. Moreover, the second ENQA survey on QA in the EHEA mentions the fuzzy lines between accreditations, audits and evaluations (Costes et al., 2008).

The European Commission's QA report of 2009 states that the European QA system might be difficult to understand because of several layers of agencies and networks and that, in many cases, it might be unclear whether the accreditation of a higher education institution in one country would guarantee that its degrees were recognised in other countries (European Commission, 2009).

Returning the discussion to academic studies, Witte (2009) analyses the reforms of QA systems in four countries: France, Germany, England and the Netherlands. Her analysis shows that the reforms of national curricular governance systems were largely determined by the heritage of national higher education systems and the internal dynamics of their political processes. QA models varied from state-approved HEI degree programmes in France and institutional audits in England to programme accreditation systems in the Netherlands and Germany, which were complemented with institutional audits or accreditations. Witte concludes that these countries have mainly been working with national issues related to governance and that the Bologna Process context has mainly been used to legitimise national interests. In Witte's opinion, the variety of the national QA systems reformed during the first years of the Bologna Process illustrates a lack of strong indications of a European trend or process of convergence in QA (Witte, 2009). Witte's analysis is mainly based on her dissertation data (Witte, 2006) and, hence, it may not have factored in the impacts that the ESG might have had on QA development.

After the establishment of the EQAR and introduction of the ESG, several studies on convergence and divergence in QA were published. These studies

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reveal that, despite some indications of convergence, there are still several sources for divergence and conceptual and terminological fuzziness.

Stensaker et al. (2010) analyse the impact of the ESG on the evaluations carried out by QA agencies. Their study shows that the ESG had an impact on the national systems of external QA. Furthermore, they distinguish between three types of changes: (a) isomorphic tendencies when the systems change to meet the standards, (b) isonymic tendencies when the names of systems change without real changes in the systems and (c) isopractic tendencies when the governments or HEIs develop practices that emulate the principles stated in the ESG but do not genuinely follow the principles or intentions that the ESG has attached to them. In other words, there are tendencies for real convergence; however, these may be construed as lip service when formal terminology changes with hardly any tangible development in practices and, in some cases, even the practices change but for reasons other than the ones stipulated in the ESG or other Bologna statements.

Vögtle (2014) quantitatively analyses the amount of policy convergence that the Bologna Process may have caused, including the topic of QA. However, the data consist of quite elementary pieces of information—for example, whether a QA system existed (e.g. 1996, 1998, 2000, 2004, 2008/yes or no) and, if so, how many study programmes were assessed (most programmes, some programmes, a few programmes, not-systematised, university dependent). This type of research may reveal general isomorphic trends in QA structures; however, it does not provide sufficient insights into the challenges of terminological and conceptual fuzziness. More importantly, the question of QA coverage is misleading because institutional evaluations may not assess individual study programmes and this type of QA has become more popular during the last decade of the process (European Commission, 2014).

Kalpazidou Schmidt (2017) analyses the development of QA systems in three Scandinavian countries. Her analysis illustrates a lack of shared QA understanding despite Bologna standards and intensive Nordic contacts and cooperation. The reforms of the QA system have been carried out against the backdrop of some national reforms linked to national objectives (i.e. not against some common European denominators related to QA). Although independent agencies in each country carry out QA, the national political contexts have given a specific character to each agency and there have also been differences in the autonomy of QA agencies.

Kohoutek et al. (2018) study the translation of the principles of internal QA of the ESG (2005) in Portugal and the Czech Republic. The study assesses the translation of the ESG principles on the scale of 'respect ... pick and choose ... neglect'. Their analysis shows that the translation of the ESG principles (2005) resembled the pattern of pick-and-choose for most topics: the ESG elements (2005) were translated into the local context in various ways and level of intensity, depending on the national legal frameworks and regulations stated by national QA agencies, the familiarity with the ESG principles and their interpretation and the administrative capacities of HEIs. There were some tendencies for conversion,

such as internal QA of study programmes, and some areas in which the ESG principles were not put into practice.

Drawing on the case studies of twelve European countries, Broucker et al. (2019a) analyse the reforms that the Bologna Process initiated. Their analysis shows that the first three 'technical' reforms (i.e. the system of easily readable and comparable degrees, the bachelor-master system of degrees and the ECTS) were implemented in most case countries despite current challenges facing the comparability of the studies. In the case of the other three initial targets (i.e. the promotion of mobility, European cooperation in QA and the European dimension in higher education), an even higher national divergence was visible. As for QA, the writers claim that the rate of divergence in QA processes, bodies and governance is still high (Broucker et al., 2019b).

4.3 Discursive practices as unifying forces in the Bologna Process and the European QA

Neave and Maassen (2007) note that the policy discursion of the Bologna Process focused initially on cultural values of higher education in the same way that the Magna Charta Universitarum of 1988 stated them. After the European Commission began participating in the process, the emphasis shifted to utilitarian values—the main aims of the Lisbon Agenda began infiltrating into the Bologna Process. The discursion that stresses the utilitarian values of higher education is analysed in several studies. These studies reveal the persuasive power of the discursion and other factors that may have impacted the Bologna Process and its QA policies.

According to Fejes (2006) the discursive practices that present the ideas of the Bologna Process are compiled in such a way that they appear 'legitimate' or 'true' beyond questioning. Fejes argues that the targets of the Bologna Process are presented as being mandatory; however, at the same time, they include 'subtle threats for the countries that do not follow them' (Fejes 2006, p. 204). In the Swedish national policy documents, for example, the Bologna Process is presented as something to which the country has to adapt if it does not intend for its students and general public to lag behind the remainder of Europe.

On the nature of QA, Fejes (2006) states that the ESG presents a narrative whereby QA standards are introduced to facilitate attaining transparency between educational systems and creating trust between the systems of different countries. At the same time, this narrative presents QA as a means of transforming HEIs and their employees into self-monitoring actors that constantly check their performance to ensure that they meet European-level standards and have satisfactory quality. If they fail to participate in this, they would be marginalised by other universities and countries.

In her article, Keeling (2006) discusses the influential discursive practices that the European Commission created during the Bologna Process and the Lisbon Strategy implementation. Keeling (2006) emphasises the role of the

European Commission in the Bologna Process. According to Keeling (2006), the Bologna Process and the Lisbon Strategy have broadened the Commission's basis for involvement in higher education and these processes have also strengthened the standing of higher education in the Commission's policy documents.

According to Keeling (2006), the Lisbon Strategy and the Bologna Process have allowed the Commission to disseminate an impactful European discourse of higher education. In this context, the Commission presents learning as a productive activity that provides students with knowledge that is useful for him/her and society in general. As a policy response, the Commission presents the Bologna reforms as ways of increasing the employability of university graduates. At the same time, its policy documents support the idea that educational activities and outputs of education are measurable. In the policy documents, knowledge production has a similar role—in the Commission's policy texts, researchers 'create "innovations", "new technologies", "knowledge assets" and "intellectual property"' (Keeling, 2006, p. 209). Keeling states that this kind of discursive practice enhances the Commission's preference for applied research. In Keeling's words, 'in this depiction, knowledge is produced and then traded' (Keeling, 2006, p. 209).

In Keeling's opinion, it appears that the European Commission itself is one of the prime beneficiaries of the higher education discourse that it has been shaping. The Commission has managed to define the agenda for the Bologna Process and the European research policy; it has also played an essential role in keeping the political discussion alive on these topics and managed to draw together these two policy issues. Thus, it has managed to confirm the standing of higher education as a key area of operations for the EU. The Lisbon Strategy and the Bologna reforms have been used in policy documents as tools for giving legitimacy to EU's actions in higher education; they have provided 'external' references to justify the Commission's increased activity in the tertiary education sector. The Bologna process and the Lisbon Strategy have also been used to support one another. The Lisbon Strategy has been used as a reference point to support EU's activities in the Bologna Process and vice versa (Keeling, 2009).

Saarinen (2005, 2007, 2008a, 2008b) analyses the discursive dimension of the policy documents related to quality and QA from the perspectives of the EU, Organisation for Economic Cooperation and Development (OECD), the Bologna Process and national governments. Her studies discuss how the language or expressions in the policy texts create common ways of speaking and perceiving the role of quality and its assurance as part of higher education policy at national and international levels. These policy documents often state their policy targets as existing facts and not policy options, thus diminishing the space for critical discussion.

According to Saarinen (2005), the use of the term 'quality' in the Bologna Process documents increased over the years in both absolute terms and in terms of the total number of words in the documents. At the same time, the meanings associated with the term 'quality' seem to have converged, evolving from the varied aspects of customer ideology and ideas of European openness into the

technical implementation details of QA systems. During the first five years of the Process, the political consensus about QA grew and, at the same time, the use of metaphors, such as biased, vacuum and movement, decreased.

Saarinen (2008a) analyses persuasive suppositions in the EU and OECD policy documents. Her analysis shows that quality was existentially presupposed in policy documents—in other words, neither the existence of quality nor its meaning was questioned. The persuasiveness of the presuppositions was not argumentative; instead, the presuppositions tended to create a particular view of higher education by presenting a desired existing situation.

The policy texts represented students as consumers of higher education and described them as rational beings who based their choices on evaluations of quality education and other objective information. Thus, 'quality' was characterised mostly by the needs of the economy and consumerism. Continuing from this, Saarinen concludes that the analysed EU and OECD policy documents presented higher education as a commodity. Besides presenting students as clients, they presupposed that the idea of competitiveness should be accepted as a value of the academic community and that the values of competitiveness and usefulness are intrinsic to the academic community.

According to Saarinen, the documents had two ways of describing universities' attitudes towards QA: (a) the use of words in the policy texts implied that universities could react either 'wrongly' (with indignation, defensiveness) or 'rightly' (thoughtfully, with wide-ranging appraisals). The analysed documents presented the top-down policy as having primary importance and opposing opinions were represented as showing resistance and being conservative (Saarinen, 2008a).

The cited studies reveal that the political discourse related to the Bologna Process includes (a) elements of persuasion (or hidden threats), (b) agendas of presenting education as a commodity or product and students as clients who make investments into their professional careers and (c) depictions of education as an instrument for increasing European-level competitiveness against other global actors. Keeling (2006) especially emphasises the Commission's dominant role in shaping the discursive practices in higher education and research.

4.4 On the governance of the Bologna Process

Multi-level governance (MLG)

According to Witte (2006), the Bologna Process is an outstanding example of a process facilitating interaction between several actors at the sub-national, national and international levels via both formal and informal routes. In her words, it is an example of 'multi-actor, multi-level governance' (Witte 2006, pp.

²⁹ Witte (2006) speaks about multi-level, multi-actor governance; other researchers that are cited here speak about multi-level governance. This study uses the term multi-level governance but multi-actor, multi-level governance when referring to Witte's study.

24-27.). Referring to Peters and Pierre (2001), Witte defines multi-actor, multi-level governance as 'negotiated, non-hierarchical exchanges between institutions at the transnational, national, regional and local levels' (Witte 2006, 26).

According to Peters and Pierre (2001), it is common to think that institutional relations are vertically ordered and that institutions mainly interact with those institutions that are immediately above or below them in the hierarchy of governance. However, in multi-level governance, interactions can take place directly between, for example, regional and transnational levels and bypass the state level (Peters & Pierre 2001, 131–132).

Witte also notes that institutional activities or relations do not need to operate by following the order of administrative levels—a regional actor can, in some cases, be active at the international level and bypass the state level. According to Witte (2006, p. 26) this principle applies to the entire Bologna process with its characteristic interaction of a multitude of formal and informal, sub-national, national and international actors. Vögtle (2014, p. 22) makes a similar comment, noting that the Bologna Process has been 'steered by a complex, multilateral and hybrid institutional arrangement'.

According to Stephenson (2013), the discussion about multi-level governance (MLG) started among researchers in the early 1990s, soon after the three big EU reforms of that time — the reform of the EU's structural funds in 1988, the establishment of the Single European Market in 1992 and the signing of the Treaty of the European Union (Maastricht Treaty) in 1992. Stephenson states that the reform of the structural funds created a need for establishing rules and procedures for shared management; the Single European act increased the role of interest groups in policy networks; and the subsidiary principle of the Maastricht treaty urged the placement of policy actions at the lowest possible levels. In field of research, the MLG became a framework used to analyse the activities of EU's structural funds to reveal different formal and informal rules and tensions at various levels of governance.

Open method of coordination (OMC)

Stephenson (2013) states that, when EU's Lisbon agenda introduced the principles of Open Method of Coordination (OMC), it became apparent that OMC and multi-level-governance (MLG) were difficult to match together. In Stephenson's opinion, the practices of MLG are not compatible with the main targets of the OMC because OMC focuses on the transparency and exchange of information, whereas MLG supports the participation of various types of actors to create complex, non-hierarchical networks for planning and implementing. According to Stephenson, the previous research literature reveals that this way of working challenges the transparency of governance and moves policy processes out of political control.

The Bologna Process has often been presented as an example of the OMC (Zahavi & Friedman, 2019; Garben, 2010; Veiga & Amaral, 2006). The research literature defines OMC as a method of soft governance—it is intended to disseminate good practices and to enhance convergence towards EU goals in the

policy areas that belong to partial or full competence of EU's member states. The OMC may be carried out via establishing guidelines, various kinds of indicators and benchmarks as well as national and regional targets followed by periodic evaluations and peer reviews (Diogo, 2016; Prpic, 2014; Veiga & Amaral, 2009, pp. 50–55; Gornitzka 2007).

Regime theory

There is yet a third analytical framework that needs to be taken into account in the discussion on governance in the Bologna Process. Zahavi and Friedman (2019) define the Bologna Process as an international regime, meaning that it has developed into a system of international coordination with implicit or explicit principles, norms, rules and decision-making procedures.

Perreira do Amaral (2010) defines an international regime in the field of education as a complex set of rules and institutions in which the provision of education is organised. It the regime context, the actors are highly dependent on one another when they define their policy agendas. Perreira do Amaral (2010) stresses the role of international organisations and the tendency of governments to apply similar principles in their educational reforms. An international educational regime (IER) is thus an institution that develops, homogenises and reproduces the ways that education is provided. A regime has some persistency—it is not a temporary constellation, although it develops in the course of history, and it has an impact on those actors (governments, organisations) that have a connection to the regime.

The 'regime-like' phenomenon was already discussed during the first decade of the Process but without explicitly describing it as a regime. Witte (2009) and Martens and Wolf (2009) claim that the founding governments initiated the Bologna Process to receive support for their national policy agendas and, according to Martens and Wolf (2009), the Bologna Process gradually gained a momentum, reducing manoeuvrability and regulating governments' power.

If we compare the three frameworks of governance presented above—multi-level governance, open method of coordination and regime-theory—it appears that multi-level governance tends to maintain diversity, whereas open method of coordination and regime-like governance would create pressures for compatibility and even homogenisation.

The multi-level governance (MLG) framework assumes that the processes of governance are inclusive in the sense that various types of actors can contribute to policy processes in several levels of administrative hierarchy. Looking at the processes of establishing European-level structures of quality assurance, it is evident that several types of actors—with uneven resources—have contributed to it and that the EU, especially the Commission, has played a central role in it. At the same time, when we compare the process of establishing structures of quality assurance at the European level and at the national level, it is evident that each level of governance has main actors of its own—there are no structures that would allow regional actors to participate in the planning or decision-making and the models for European-level structures are planned by

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European-level policymakers even though the decision to accept them was made by the representatives of national governments during Bologna conferences. At the national level—in the case of Finland—the national version of quality assurance was planned by a taskforce represented by the national QA agency, the Ministry of Education and some stakeholder organisations, and the system was established by the national agency without governmental decisions. Hence, Finland's process of establishing European- and national-level structures appears to follow a stricter hierarchical order than the MLG theory assumes.

The OMC framework appears to be an element that enhances cohesion and the follow up mechanisms of the Bologna Process-which are an essential element of the OMC – especially appear to create strong cohesive forces. Ravinet (2008) analyses the role of follow-up mechanisms of the Bologna Process as an integrative force. As noted earlier, after the Prague Conference of 2001, the follow-up mechanism of the Bologna Process was formalised and began to gain stronger legitimacy and, hence, the signatory countries could no longer ignore the task of submitting their national reports. The reports were published on the Bologna Process secretariat's webpages and were standardised to facilitate a comparison of the development of the Bologna targets in different countries. According to Ravinet (2008), this created a kind of naming and shaming mechanism of which the representatives of national governments were well aware. From 2005 onwards, stocktaking reports, which included the subject of QA, made it even easier to compare how member states had fulfilled their Bologna Process commitments. Ravinet concludes that the Bologna Process did not oblige member countries to implement the stated reforms; instead, the follow-up mechanism created a situation in which a member country played a role according to the rules that the process and its follow-up mechanism had created.

The concept of 'regime' emphasises the idea that, although the Bologna Declaration of 1999 was originally a general statement of intentions, in Zahavi and Friedman's (2019) words, it now began to be 'a player with a life of its own'. Zahavi and Friedman (2019) remark that, in this manner, the power in higher education issues gradually shifted from national governments to the Bologna Process and, eventually, to the European Commission itself. Zahavi and Friedman further assess that the Bologna Process has an impact that transcends geographical boundaries—even countries that have not joined to the Process may adopt its principles and apply its rules. In other words, the basic ideas of the regime-theory are contradictory to what was said in the introductory section of this study—where it was stated that 'each country can make independent decisions about its provision of education, funding, resources and all other policy decisions that can affect the quality of education' (See Chapter 1).

The regime theory appears to differ from the multi-level governance model in that it stresses the cohesive or unifying forces of a regime. Unlike the other two frameworks, it stresses the role of regime (in this case the Bologna process) as an independent policymaker. The explanatory power of these three frameworks is discussed in the Conclusions chapter.

5 RESEARCH ARTICLES

5.1 Summary of the articles

The main research question of this study was:

How has the Bologna Process dealt with the challenge of diversity and the conceptual and terminological fuzziness related to it in the field of QA?

This research question was divided into five sub-questions as follows:

- How has diversity in QA manifested itself during the Bologna Process?
- How have the Bologna Process and its actors tried to cope with this diversity?
- What kinds of agendas have the main actors' contributions revealed during the Bologna Process?
- What does a case study of national interpretation reveal about diversity in the field of QA?
- How have new structures been perceived among the personnel in HEIs?

The four articles of this study analysed diversity from the following four points of view:

- What does diversity mean in the field of QA? What evidence do we have of it? (Saarinen & Ala-Vähälä, 2007)
- What European-level structures have been suggested for coping with the challenge of diversity and what has been put into practice? How did this process proceed from ENQA'a point of view? (Ala-Vähälä & Saarinen, 2009)
- Based on the of case Finland, what has been the national solution to QA and how does it reflect the (various) targets assigned to QA during the Bologna Process? (Ala-Vähälä & Saarinen, 2013)
- What has been the reception of the implemented system? (Ala-Vähälä, 2016)

Table 3 presents the contributions of the four articles to these research questions and introduces the main research methods of the study.

Table 3 Research articles' questions and contributions to the study

Research question	Article	Main method	Contribution to study
What does	Saarinen	Document	The use of the term 'accreditation'
diversity mean in	and Ala-	analysis	varies between countries and
the field of QA?	Vähälä	,	within the same country
~	(2007)		depending on the context where it
			is presented.
			The same procedure may have
			different names depending on
			whether it is presented nationally
			or internationally.
What European-	Ala-Vähälä	Interviews	Being initially a forum for the
level structures	and	and document	exchange of information and
have been	Saarinen	analysis	cooperation, the ENQA soon
suggested to cope	(2009)	,	reached the status of an actor in
with the challenge			the Bologna Process. The ENQA
of diversity and			began developing procedures to
what has been put			increase the credibility of its
into practice?			member agencies and strive for a
1			position of a gate-keeper in QA.
			This was not given to it; instead, a
			separate EQAR was established.
What kinds of	Ala-Vähälä	As above	As above
agendas have the	and		
contributions of the	Saarinen		
main actors	(2009)		
revealed during the			
Bologna Process?			
What has been the	Ala-Vähälä	Ala-Vähälä's	The chapter presents the Finnish
national solution to	and	and	response to the requirements of
QA in Finland?	Saarinen	Saarinen's	the system of accreditation,
	(2013)	previous	certification or similar processes
		research	stated in the Berlin Communiqué
			and its impacts on HEIs.
What has been the	Ala-Vähälä	Survey,	The reception of the new system
reception of the	(2016)	statistical	differed among the personnel
implemented		analysis	across research universities and
system like?		-	universities of applied sciences. It
			also varied according to the
			respondents' positions in their
			institutions. The article (together
			with Ala-Vähälä, 2011, 2009)
			indicates that the context of the
			Bologna Process commitments
			was not essential when people
			assessed the impacts of QA. The
			totality of several reforms and the
			internal development of the
			institutions had a more significant
			impact on their assessments.

5.2 Research methods

The four articles of this study used several methods.

In the first article, Saarinen and Ala-Vähälä (2007) studied the use of the term 'accreditation' in the context of the Bologna Process in four countries (i.e. Finland, the Netherlands, France and Sweden) during the first years of the Bologna Process.³⁰ The main study method was linguistic analysis of the term accreditation in different policy contexts. The study had three levels of analysis:

- accreditation as a word, discussing the nomenclature used in the national context and when the system was presented internationally;
- accreditation as a concept, discussing what kinds of descriptions were given to accreditations or related actions and how accreditation was defined in the policy documents;
- accreditation as an action, analysing what practical actions had been suggested to respond to the demand for accreditation or similar procedures in the Bologna Process but having various definitions or names.

The data of the study consisted of higher education policy documents as follows:

- Primary documents of the Bologna Process (e.g. declarations and communiqués),
- national documents that were produced for follow-up or reporting purposes of the Bologna Process and
- national planning documents from both before and during the Bologna Process.

The second article (Ala-Vähälä & Saarinen, 2009) studied the development of ENQA's role during the implementation of the Bologna Process. It discussed the development of the European-level QA structures and commented on the roles of the EU and EUA in this process. The study was based on four interviews with people who had been ENQA-steering group members or administrators and it also used written sources such as policy statements and reports for the Bologna Process. The study analysed the interviews from the perspective of how the interviewees defined the role of the ENQA and its development. As all the interviewees presented their views from the perspective of their experiences in

³⁰ Saarinen carried out the analysis of Bologna Process documents and the cases of Finland and Sweden. Ala-Vähälä analysed the cases of the Netherlands and France. Ala-Vähälä's analysis was partly based on his previous studies (Ala-Vähälä, 2005, 2003). The research questions and final analyses were planned together and Saarinen had the main responsibility for writing the report.

the ENQA, the information from interviews and documents was compared against written documentation from the European Commission and the EUA.³¹

The third article (Ala-Vähälä & Saarinen, 2013) presented the Finnish system of audits, discussed its impacts on HEIs and analysed how the targets of the Bologna Process were interpreted on the national level of implementation. The article is a book chapter and was based on Ala-Vähälä's and Saarinen's previous research.³² Saarinen focused on the development of the 'pre-Bologna' era, and Ala-Vähälä concentrated on the analysis of the audit system. Ala-Vähälä also carried out the analysis of the activities of Finnish Higher Education Evaluation Council.

In the fourth article, Ala-Vähälä (2016) analysed the Finnish case of new QA structures in terms of their reception in HEIs. The data of the study were collected using a web-based survey from the personnel of four multidisciplinary universities and four universities of applied sciences that had undergone the audit process.

The invitation to take part in the survey was sent to academic personnel and to personnel in administration and support services. In addition to central administration and support services, the survey covered eight fields of education. In universities, the faculties of: (1) social sciences, (2) educational sciences, (3) natural sciences and (4) faculties of law. In applied sciences, the study fields of: (1) social services, health and sport; (2) technology, communication; (3) social sciences, business and administration; and (4) culture.

The respondents were classified using cluster analysis. This was considered to be useful because job titles may have not given reliable information about the contexts in which the respondents were working. It also assisted in generating more reliable comparisons between research universities and polytechnic institutions because they have different academic personnel structures and, presumably, different ways of working.

The cluster analysis allowed for the creation of groups with similar professional profiles and for a comparison between them. The variables used in the cluster analysis were selected so that the analysis would enable classifying the personnel according to their various commitments, academic or administrative careers, level of education and networking activity.

5.3 Results of the articles

The first article (Saarinen & Ala-Vähälä, 2007) discussed the conceptual and terminological fuzziness of QA, focusing on the use of the term accreditation. The

³¹ The interviews were planned and carried out together, except for one that was done solely by Saarinen. The analyses of the policy documents and writing of the main parts of the article were carried out by Ala-Vähälä with comments by Saarinen.

the article were carried out by Ala-Vähälä with comments by Saarinen.

32 Ala-Vähälä's part was mainly based on Ala-Vähälä (2011), which reported the results of a survey and on a series of interviews that were carried out in 2009–2010. The data of the survey were also used in the fourth article of this study, Ala-Vähälä (2016).

writers hypothesised that the term accreditation would be vague in that national systems would converge towards similar terminology; however, at the same time, the definitions and operational contents of the term accreditation would differ.

The analysis supported the hypothesis, showing that the term accreditation was used in different ways in the case countries. Different types of QA procedures were referred to as accreditations—and the role of an independent expert-auditor/evaluator especially varied from country to country. In some cases, the ways in which the term accreditation was linked to a particular policy varied, depending on whether the context was national or international. In the case of France, for example, the action of accepting degree programmes was called 'habilitation' in the national context but 'accreditation' in Bologna Process reporting.

Saarinen and Ala-Vähälä (2007) concluded that the goals of the Bologna Process appeared uniform in the documents; however, as the demands were taken to the national level, new pressures were placed on them. The apparently similar QA goals were presented in different ways, depending on national policy needs.

The second article (Ala-Vähälä & Saarinen, 2009) analysed the development of the European-level structures of QA, especially the development of the role of the ENQA and the founding of the EQAR.

Ala-Vähälä and Saarinen (2009) concluded that, although the ENQA was originally intended to be an organisation for networking and cooperation, its role gradually evolved into an active policymaker in the Bologna Process. The EUA and its predecessors had a long experience of QA and, in the years since the Bologna Process began (about 2001–2005), they had on their agenda a European-level QA structure in which universities would have a central role in coordinating national activities in QA. This caused tension between the EUA and ENQA, which aimed at creating a similar structure but having the QA agencies be its main actors. This tension is evident not only in the interview data but also in the written policy statements of the EUA and ENQA.

Ala-Vähälä and Saarinen (2009) concluded that by the time of the Berlin Conference (2003) and the Bergen Conference (2005), ENQA's position had been consolidated in the Bologna Process; for example, it was given essential tasks such as the coordination of the preparation of the ESG. Based on the analysed interviews and documents, three factors were found that supported this development. First, the ENQA represented QA organisations, which are usually funded by governments and are more dependent on the political will of governments than universities. Thus, the QA agencies and ENQA were more familiar with ministries of education than the EUA, which represented European universities. Second, since the mid-1990s, the European Commission had supported activities that belonged to the ENQA field and ENQA's current role in the Bologna Process could be seen as part of a continuum in this respect.

As a third and more speculative explanation, Ala-Vähälä and Saarinen (2009) suggested that the ENQA was part of a system of balances and counterbalances between universities and national governments. Since the

Salamanca Declaration in 2001, the EUA had proposed systems in which the universities had a central role in coordinating the European structures of QA. The Commission and the Bologna ministers, however, gave the ENQA the task of coordinating the planning of the Register, together with other relevant stakeholder groups. However, the ENQA or its members were not given a gatekeeper's role in the field of QA. The debate about the EQAR indicated that the ENQA had grown to the limits of its power.

Subsequent documents, not studied during this research, support the idea that the European Commission aimed at creating separate, mutually independent QA structures (see Section 3.5; European Commission, 2009).

The third article (Ala-Vähälä & Saarinen, 2013) stated that during its first ten years of activities, the FINHEEC carried out a broad range of activities such as thematic evaluations of disciplines and benchmarking projects and assessment of units, applying the status of educational excellence throughout its years of activity. However, these activities diminished drastically in 2005, as the FINHEEC implemented QA system auditing. This system was the Finnish response to the Berlin Communiqué's requirement of accreditations, habilitations or similar systems of external QA.

Drawing on audit handbooks and research literature, Ala-Vähälä and Saarinen (2013) stated that the audits did not impose any (strict) external standards or reference levels on education or learning outcomes; instead, the audits were improvement-oriented, as was customary in the Finnish higher education evaluation tradition. The external audit group made a public report of the audit visit and the Finnish Higher Education Evaluation Committee decided whether the QA system worked correctly or the HEIs required a re-audit after some years. In brief, there were no direct sanctions.

Ala-Vähälä and Saarinen (2013) claimed that the impacts of audits differed between research universities and polytechnics. Most universities lacked an allembracing QA system before the system of audits. In other words, they were obliged to create or systematise the QA systems to pass the audits. The situation of the UAS was slightly different. Even before 2005, many UAS had small audits of their quality work. The FINHEEC also assessed their applications for permanent operating licences and master-level programmes. This may have been one reason for the more positive attitude towards quality work and audits among the UAS personnel.

The topic of the reception of the quality work and audits among the HEI personnel is discussed in the fourth article (Ala-Vähälä, 2016). According to Ala-Vähälä (2016), the reception of new systems of internal QA and their audits varied strongly between universities and UAS and the personnel groups.

The survey revealed that in almost all personnel groups and topics that were measured, the personnel in universities were more critical of the new QA modes than the personnel in similar groups in UAS.

In both HEI types, the personnel in managerial positions had the most positive attitudes towards quality work. At universities, the academically oriented young researchers—an absent group in the UAS—were either the most

critical of QA or refrained from expressing their opinion. The analysis also revealed that they had quite loose ties with university organisation, which may explain their attitudes and weak commitment to quality work.

6 CONCLUSION

The main research question of this study inquired how diversity and the conceptual and terminological fuzziness related to it were dealt with by the main contributors to the Bologna Process.

The main research question was divided into five sub-questions, as follows:

- How has diversity in QA manifested itself during the Bologna Process?
- How have the Bologna Process and its actors tried to cope with this diversity?
- What kinds of agendas have the main actors' contributions revealed during the Bologna Process?
- What does a case study of national interpretation reveal about diversity in the field of QA?
- How have new structures been perceived among the personnel in HEIs?

The first two articles presented above discussed diversity in the field of QA and policy processes, which were intended to either create compatibility or enhance credibility for the national QA systems in the EHEA. The two other articles discussed the process of establishing QA systems and their reception in one case country (i.e. Finland).

Chapters 2, 3 and 4 presented the research literature and some policy documents and, this way, they put the results of the articles in a broader policy context. Table 4 presents the research questions and summarises the main findings.

Table 4 Summary of the research questions and the main results of the study

Research question	Main results
1. How has diversity in QA manifested itself during the	Diversity and terminological and conceptual fuzziness in the field of QA among the Bologna Process countries have
Bologna Process?	been discussed in several articles and other reports
C	(Sections 4.1 and 4.2). Saarinen and Ala-Vähälä (2007)
	analysed the complex relationship between names,
	concepts (or their definitions) and the actual ways of
	organising QA.
2. How have the Bologna	The Bologna Process has introduced two main ways for
Process and its actors tried	coping with the challenges of diversity: (a) standards that
to cope with it?	would guide the activities of QA agencies and (b) a
	European-level QA system for QA agencies (Sections 3.4
	and 3.5).
3. What kind of agendas	The study illustrates the different agendas that various
did the main actors have	stakeholders, especially the EU and EUA, have had
during this process?	during the process of building these systems (Sections 3.4
	and 3.5; Ala-Vähälä & Saarinen, 2009).
4. What does a case study	The Finnish case shows that on the national level of
of national interpretation	implementation, policymakers introduced new targets to
reveal about the diversity of	the system, which then became loosely connected to the
the process?	original European-level targets of the Bologna Process
F 7471 . 1 1 .1	(Section 3.6; Ala-Vähälä & Saarinen, 2013).
5. What has been the	The reception of the new QA systems occurred in a
reception of the new QA	context where the personnel in HEIs had experienced
structures in HEIs?	several reform processes and preferred to link quality
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	2016).
	work to national policy contexts and internal developments in HEIs rather than or not at all to the implementation of the European-level commitments of the Bologna Process (Section 3.6; Ala-Vähälä & Saarinen, 2013). The roles that the respondents had in their institutions and status of the employment (permanent vs temporary; research, teaching vs management, a young researcher in temporary posts vs established researchers) appear to have had an elementary impact on the reception. People in the UAS had more favourable attitudes towards the new QA systems than people in universities (Ala-Vähälä,

6.1 Diversity and fuzziness: Ways for coping

Based on this study and the previous literature, there is substantial research evidence of diversity between QA systems and conceptual and terminological fuzziness and lack of transparency in QA (Saarinen & Ala-Vähälä, 2007; also see Section 4.1); this conception especially applies to the first years of the Bologna

Process. However, this study and other research (Saarinen, 2008b; Witte, 2009) indicate that the process whereby European-level commitments were translated into national contexts includes elements of elliptical information, mixed messages to different audiences and re-interpretation of policy targets. Hence, there is a particular new element of opacity and fuzziness in the European QA system even after the Bologna Process commitments have been implemented into practice at the national level.

The Bologna Process introduced two main ways for coping with the challenges of diversity in higher education and its QA: (a) standards that would guide the activities of QA agencies and (b) a European-level QA system for QA agencies. These two approaches support or are dependent on each other. The European-level QA system requires a normative basis (i.e. criteria or standards). At the same time, the European-level QA standards would be of insignificant value if no organisation or system would ensure that QA agencies follow the stated principles.

Section 3.3 introduced two main ways for defining QA standards: either by defining criteria for higher education outcomes or by defining standards for the processes and procedures of QA. The EU has been the leading proponent of the first alternative, whereas the EUA has advocated the second alternative. Both the EU (the Council and the Commission) and the EUA have been speaking about high quality higher education and QA, albeit with different accents, and the contexts in which their policy goals were posited have not been identical. For the EU, the main targets have been to enhance the mobility of students, graduates and researchers and to strengthen the higher education sector to support economic growth and competitiveness. For the EUA, quality work has meant support for management in its ambitions for better performance or excellence.

The first policy process that intended to create common QA standards yielded the ESG (ESG, 2005); this document was then used as a reference when the national QA agencies joined the European Quality Assurance Registry (EQAR). Categorising the ESG (2005) into assessment against educational outcomes and assessment against structures, procedures and resources has shown that the ESG of 2005 opted for the second alternative.

The current version of the ESG document for QA (2015) specifies the role of qualifications frameworks at the level of internal QA of HEIs but leaves external QA open for other options. Thus, these two approaches may not be mutually exclusive in that both can find their niches in the QA structures. The ESG of 2015 states that in the internal activities of HEIs (e.g. in planning and assessing the degree programmes), the European and national qualifications frameworks may be a useful tool; however, at the level of institutional assessment, the more process-oriented standards may be more useful. In general, the ESG of 2015 follows the principles of the first version and, in the field of external QA, it focuses on the processes and procedures of QA.

What has been the rationale for choosing the 'weak link' between educational outcomes and QA? The ESG of 2005 mentions the experiences of the TEEP project which studied the possibilities of connecting qualifications

frameworks and QA with the results that were not reassuring, as stated in the report. The second reason may be about the countries that have chosen to assess HEIs instead of disciplines and this choice gained more popularity during the Bologna Process (e.g. European Commission, 2014). In the case of institution-level assessment, it would be difficult to check each degree programme against national and European-level educational frameworks; however, it is possible to check whether HEIs have some procedures in place for checking it themselves. This may explain why the link between degree programmes and educational frameworks was included at the level of internal QA.

The second line of coping with diversity in QA has consisted of creating European-level structures that would assure the credibility of QA agencies. As stated in Section 3.4, three main alternatives were suggested:

- The system of mutual audits or assessments of QA agencies (suggested by the ENQA);
- The mutual audits by QA agencies and a European-level clearing house giving accreditation or certification for agencies that pass the audits (to be coordinated by European universities and stakeholder organisations as suggested by the EUA);
- The model of an independent European registry of QA agencies, including a system of audits or assessments of QA agencies (suggested by the European Commission).

The actual registry that was established in 2007 reflects the ideas that the Commission had presented in its 2004 proposal (European Commission, 2004a) and, later on, in its assessment of the QA situation in 2009. It recommended establishing a clear division of roles between the main actors, such as the ENQA and EQAR. This indicates that the Commission has consistently been interested in loosening the connections between the registry and the two important actors of the Bologna Process (i.e. the EUA and ENQA).

6.2 Implementation on whose terms? The case of Finland

Section 3.5 of this study and Ala-Vähälä and Saarinen (2013) analysed the backdrop against which national policy decisions about QA systems were made. They also analysed the impacts of these decisions on the activities of HEIs. Meanwhile, Ala-Vähälä (2016) discussed the reception of the new QA systems.

The case of Finland reveals the vertical dimension in diversity. The Finnish system of auditing QA systems of HEIs was established to implement the commitments stated in the Berlin Communiqué of 2003 and, presumably, it was intended to meet the requirements that were anticipated to be in the ESG, which was being planned at that time. However, this policy choice resulted in a system that had quite loose connections with the original targets that were being

discussed during the first years of the Bologna Process. The Bologna Process was about creating common structures for education and enhancing the free movement of students, scholars and graduates. Nationally, the introduction of the new QA systems was part of several other national reforms, such as the merger of small HEI units and the introduction of new managerial elements into administration. Witte's (2009) study indicates that this has also been the case in other countries.

Section 3.3 concluded that the EU emphasised, in its policy papers, the aspect of controlling quality, whereas the CRE/EUA focused on quality management. Both of these alternatives stressed the need for ensuring that education providers meet higher education requirements. The Finnish solution favoured the alternative that was advocated by the CRE/EUA—a QA system that would improve the quality of education in each HEI without any links to qualifications frameworks or other outcome-oriented criteria.

Although the Finnish model resonates closely with ideas of the EUA, no evidence exists to imply a direct adaptation of the EUA's principles. The policymakers that defined the principles of the Finnish model were most probably aware of the EUA's standpoints; however, the model they proposed strongly reflected national interests and the long national QA tradition. The model did not challenge the decision-making authority of the government for the provision of education and was based on practices that the FINHEEC had developed since the late 1990s.

The history of the planning of the Finnish audit model indicates that the HEI personnel were omitted from the planning process (Section 3.5; also see Saarinen, 2008b). This may account for academic personnel's mistrust of the new modes of QA, excluding people holding managerial positions (on mistrust, see Ala-Vähälä, 2011, 2016). Other reasons may include the loose connections between young researchers and their institutions (Ala-Vähälä, 2016), time constraints and the initial reluctance of university managers to create QA systems that would meet common standards (Ala-Vähälä & Saarinen, 2013; also see Section 3.6).³³

6.3 What do the QA-related policy processes reveal about the models of governance in the Bologna Process?

Chapter four discussed the cohesive forces and forces that have caused diversity and fuzziness in higher education and its quality assurance, presenting three frameworks of governance that research literature has used to conceptualise governance of the Bologna Process—the multi-level, multi-actor governance, the open method of coordination and the theory of international regime. The research articles found in this paper, as well as the discussion presented in

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³³ Overberg 2019a and Overberg 2019b discuss further the reception of new QA systems and ways in which the personnel at higher education institutions has adapted to them.

previous chapters, indicate that these frameworks cast some light on this study's topic but do not explain all aspects.

The multi-level governance (MLG) model emphasises the role of various types of institutions in governance and its non-hierarchical nature. This means that actors at each level of governance can participate in planning or decision-making at other levels, too, and this interaction does not need to follow hierarchical orders—in an MLG system, a regional actor may contribute to the planning or implementation of an EU programme at the European level and bypass the national level. However, this study indicates that, during the process of creating European-level structures of quality assurance, each level of governance has had some main actors of its own. This applies to the European level and also to the case of Finland. The national system of quality assurance was created by national-level actors, such as FINHEEC with ENQA and the Ministry of Education, although they had interactions with their European-level counterparts.

At the same time, people who worked in academia, higher education administration or stakeholder organisations, may have been active at several levels and sectors of governance. Ala-Vähälä's study of 2011 indicates that there are some key experts in the field of quality assurance who participated in the planning of the new system at the national level, implemented the new systems in their own units, guided the implementation in lower levels of university administration and were also members of audit groups that visited other universities in both own country and abroad (Ala-Vähälä, 2011, 28-29). In other words, some experts appear to act at several levels of governance but the institutions tend (at least in this case) to focus on the processes of their own level. However, this topic requires more research because, in some cases, it may be difficult to know whether an expert is invited to a certain forum because of his/her expertise or due to the institution he/she represents. It is also possible that the MLG model is unable to explain the process of establishing new systems of governance but that it helps develop understanding of how they function afterwards.

As stated above, open method of coordination (OMC) is a method of soft governance that developed as a part of the Lisbon Agenda. OMC aims at sharing and disseminating good practices in policy areas that belong to partial or full competence of the EU member states. The principles of OMC were intended to guide policy processes within the EU but it is also reasonable to expect that they have impacted the Bologna process—that is, outside the institutional limits of the EU. The system of follow up and the dissemination of good practices that the Bologna process has adopted may have their roots in OMC procedures. However, the ideas of OMC do not explain the policy processes that led to the establishment of European—or national-level systems of QA nor the mutual relations, dependencies, tensions and co-operation between the main actors who participated in the development of the new QA structures.

International regime, in turn, denotes a system of international coordination that has implicit or explicit principles, norms, rules and decisionmaking procedures. The words 'implicit or explicit' indicate that the status of the regime is not necessarily based on international law or agreement with some legal power. This is exactly the case with the Bologna process, which is more of a statement of intentions than an agreement between nations.

In the context of the Bologna Process, the regime theory helps conceptualise the relation between the Bologna process as and its member states. As previously stated, the Bologna Process may be defined as a process or as an actor and the regime theory emphasises the actor aspect of it. Unlike the multi-actor governance model, the regime theory assumes that the regime tends to press the institutions under its influence towards uniformity or compatibility. The discussion presented in Chapter 4 also indicated that the European Commission had acquired an influential position in this regime. Based on this, the EU has acquired power in the sphere of European higher education through this regime.

The discussions in Chapters 2, 3 and 4 show that the EU can draw on several tools to influence the Process—it can contribute to it directly as a member of the process or via its administrative and financial resources. The Commission can create or enhance discursive practices that support its policy agendas. It may simultaneously finance several projects that are linked to the Bologna Process and in this manner test and enhance ideas that may contribute to the Process and create political pressure. The EU can publish several types of policy documents that, without having a direct statutory leverage over the Bologna Process, may create political pressure to influence it.

The leading stakeholder organisations in the field of higher education QA, EUA and ENQA, have received funding from the Commission for their Bologna Process-related projects. The ENQA was even founded through financial support of the Commission. At the same time, these organisations have had policy interests that are against the policy targets that the Commission had expressed. This indicates that the processes of defining policy targets are carried out by actors that have different, and sometimes even contradictory, policy targets but are, at the same time, mutually dependent.

The example of the Standards and Guidelines for Quality Assurance (ESG) shows that the EU has not been in a position to dictate the contents of the Process even though it has been characterised as an informal leader of the Process (Zahavi & Friedman, 2019). Although the Commission has supported the process of defining the ESG, it has also been critical of its contents. In the case of the European registry, the main stakeholders (i.e. the ENQA, EUA and Commission) quickly reached a compromise; however, it took nearly eight years before the Bologna Process accepted the idea that universities could invite QA agencies from other EHEA countries to carry out external assessments that a certain national system required of them. In terms of linking qualifications frameworks and QA standards and guidelines, it took ten years to reach a compromise.

The case of opening external quality assurance to agencies from other states in the EHEA reveals that the EU has tried to loosen the connection between external quality assurance and national governments in order to 'de-nationalise' the external quality assurance. Another example of this target is the idea of

merging smaller systems of external quality assurance into bigger multi-national units, which the Commission suggests in its assessment report of 2009. However, these ideas appear to have met resistance. As noted above, it took nearly eight years before the Bologna Process accepted the idea that universities could invite QA agencies from other EHEA countries and the Commission's assessment of 2014 does not repeat the idea of merging small national agencies. These examples indicate that member states may have had their say in defining policy targets during conferences and were able to inhibit the progress of agendas that they were not eager to follow.

The research literature and the findings of this study indicate that, although the Bologna Process creates pressures to harmonise the systems of higher education and their quality assurance, member states can navigate their interpretations of the Bologna commitments and the presentation of their national solutions in the European context. In other words, it is possible that the Bologna process has advanced the formal compatibility of higher education systems and their quality assurance but there are still national differences that neither formal terminology nor official descriptions reveal.

To sum up, even though the Bologna process can be defined as a kind of regime, this does not mean that it is a monolithic institution—instead, it is more like a network of actors who simultaneously have different policy targets as well as mutual interests and dependencies. Even if the Process could state common policy targets and create pressures for member states to implement them, the lack of sanctions and the fuzziness of information create opportunities for individual states to manoeuvre.

6.4 Lessons learnt and further research topics

The general aim of this study was to investigate diversity in QA and the challenges associated with it, which traverses several fields and levels of administration and policymaking and manifests itself in multiple ways in various contexts. The second target of this study was to analyse the policy processes that aim at coping with the challenges related to the phenomenon in question. The results of these analyses were presented in the previous chapters.

The structures that have been created to cope with diversity and fuzziness are still working and the history of their establishment helps in understanding the internal tensions of the system and the potential crises that may arise. The study revealed several new topics for future research, especially in the fields of policy processes, mutual dependencies and power structures in the Bologna Process. For example, the relationships between the EU (especially the Commission), the EUA, the ENQA and national states illustrate that the main actors—who have been contributing to the process—have asymmetrical access to resources and ways in which they can contribute to policy processes. Although this study sheds light on the relations between the main European-level actors in the field of European QA, there is still research to be done, especially on the role

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of member states in Bologna decision-making processes in both historical narratives and theoretical analyses.

This study also indicated that the systems of quality assurance have converged at some levels. The QA agencies need to meet common criteria in order to be accepted to the European Quality Assurance Registry. The use of some basic terms, such as 'accreditation', 'audit', etc., has apparently become more unified across the Bologna Process member states because of Europeanlevel standards and resulting from several surveys and other information exchanges. Yet, there is still research to be done about what happens in individual member states or in higher education institutions. The research literature discussed in section 3.2 indicates that there is still diversity and fuzziness in the field of quality assurance. One interesting question for further research is whether transparency and shared understanding can develop by means of the stated QA standards or qualifications frameworks and what the role of more 'organic' development would be-that is: the development of shared understanding about the nature of QA in the course of transnational co-operation between universities and QA agencies and via the experiences of QA experts who work across national borders.

YHTEENVETO

Tutkimus analysoi korkeakoulutuksen laadunvarmistukseen liittyvää monimuotoisuutta Bolognan prosessin piirissä sekä poliittisia toimenpiteitä, joiden tavoitteena on ollut siihen liittyviä haasteita. Tutkimuksen pääkysymys oli, miten Bologna prosessi on vastannut laadunvarmistuksen monimuotoisuuden haasteeseen ja siihen liittyvään käsitteelliseen ja terminologiseen sumeuteen. Tutkimuskysymys jaettiin viiteen alakysymykseen seuraavasti:

- Missä muodoissa laadunvarmistuksen monimuotoisuus sekä siihen liittyvä käsitteellinen ja terminologinen sumeus on tullut esiin?
- Miten Bolognan prosessi ja sen keskeiset toimijat ovat vastanneet monimuotoisuuden ja sumeuden haasteeseen?
- Millaisia toimintastrategioita prosessin keskeiset osapuolet ovat valinneet?
- Mitä tapaustutkimus yhdestä kansallisesta tulkinnasta vastata Bolognan prosessin sitoumuksiin paljastaa laadunvarmistuksen monimuotoisuuden ja sumeuden luonteesta?
- Miten uudet laadunvarmistuksen rakenteet on vastaanotettu yliopistoissa ja ammattikorkeakouluissa?

Väitöskirja koostuu yhteenvedosta ja neljästä artikkelista. Nyt toteutettu tutkimus ja aiempi tutkimuskirjallisuus tuovat esiin sekä laadunvarmistuksen monimuotoisuuden että siihen liittyvän käsitteellisen ja terminologisen sumeuden.

Bolognan prosessi on omaksunut kaksi toimintatapaa, joilla vastata korkea-koulutuksen ja sen laadunvarmistuksen monimuotoisuuteen: (a) standardit, joilla pyritään ohjaamaan kansallisten laadunvarmistuksen yksikköjen toimintaa ja (b) eurooppalaisen tason laadunvarmistuksen järjestelmä kansallisten laadunvarmistuksen yksikköjen toimintaan.

Myös laadunvarmistuksen standardeihin on sisältynyt kaksi päävaihtoehtoa: (a) koulutuksen lopputuloksiin kohdistuvat standardit ja (b) laadunvarmistuksen prosesseihin kohdistuvat standardit. Vuonna 2005 Bolognan prosessin Bergenin konferenssissa hyväksytty dokumentti "European Standards and Guidelines for Quality Assurance in Higher Education (ESG 2005) valitsi jälkimmäisen vaihtoehdon; siinä määritellyt standardit kohdistuivat laadunvarmistuksen prosesseihin ja periaatteisiin. Dokumentin voimassa oleva, vuonna 2015 hyväksytty versio liittää laadunvarmistukseen myös koulutuksen tavoitteet mainitessaan korkeakoulutuksen eurooppalaisen viitekehyksen (European qualifications framework) mutta kytkee koulutuksen sisällölliset tavoitteet yliopistojen ja korkeakoulujen sisäiseen laadunvarmistukseen ja jättää ulkoinen laadunvarmistuksen avoimeksi muille vaihtoehdoille.

Euroopan komissio on ollut ensimmäisen vaihtoehdon keskeisin ajaja, kun suunnitteluprosessissa keskeisenä taustavaikuttajana toiminut Euroopan yliopistoliitto (EUA) on kannattanut kriteeristöä, joka kohdistuisi laadunvarmistuksen

prosesseihin. Näkemyserot tuovat esiin perustavia eroja näiden kahden tahon tavoitteissa. Euroopan komissio on ajanut laadunvarmistuksen järjestelmää, joka tukisi opiskelijoiden ja tutkinnon suorittaneiden liikkuvuutta ja koulutuksen yhteismitallisuutta ja järjestelmien yhteensopivuutta. Euroopan yliopistoliitto on puolestaan korostanut laadunvarmistuksen roolia, kun korkeakoulut kehittävät toimintaansa, ja profiloituvat laadullaan.

Toinen eurooppalaisen korkeakoulutuksen laadunvarmistuksen laatua varmistamaan tarkoitettu toimintalinja on eurooppalaisen tason laadunvarmistuksen rakenteiden luominen. Sen tavoitteena on taata kansallisella tasolla toimivien laadunvarmistuksen yksikköjen uskottavuus. Näitä rakenteita suunniteltaessa esiin nousi kolme päävaihtoehtoa:

- Laadunvarmistuksen yksikköjen keskinäiset auditoinnit, eurooppalaisten arviointitoimijoiden järjestön (ENQA) esittämä vaihtoehto;
- Euroopan yliopistoliiton esittämä ajatus laadunvarmistuksen yksikköjen keskinäisistä auditoinneista, ja sitä koordinoivasta eurooppalaisen tason akkreditointi-organisaatiosta, joka myöntäisi akkreditoinnin tai sertifioinnin yksiköille, jotka läpäisevät auditoinnit; tämän mallin mukaan kattoorganisaation toimintaa olisivat ohjanneet eurooppalaiset yliopistot ja korkeakoulualan intressiryhmiä edustavat järjestöt;
- Euroopan komission esittämä malli, jossa on riippumaton laadunvarmistuksen rekisteri, sekä rekisteriin hyväksymiseen vaadittava laadunvarmistusyksikköjen auditointien tai arviointien järjestelmä.

Bolognan prosessin valitsema eurooppalaisen tason laadunvarmistuksen malli seurasi paljolti Euroopan komission vuonna 2004 esittämää mallia koostuen eurooppalaista laadunvarmistuksen rekisteristä (EQAR), johon hyväksytyksi tuleminen edellytti joko hyväksyttyä auditointia tai jäsenyyttä eurooppalaisten arviointitoimijoiden järjestössä (ENQA). Toteutettu versio vastaa Euroopan komission tavoitetta kehittää laadunvarmistuksen eurooppalaisia rakenteita siten, että useista toisistaan riippuvista toimijoista, joilla jokaisella olisi omat rajatut tehtävänsä.

Korkeakoulutuksen ulkoisen laadunvarmistuksen järjestelmän suomalaisen version julkilausuttuna tavoitteena on ollut tukea yliopistojen ja ammattikorkeakoulujen laatutyötä ja laatujohtamista auditointien avulla. Vaikka Suomessa omaksuttu järjestelmä muistuttaa Euroopan yliopistoliiton esittämiä ajatuksia, se perustuu käytäntöihin, joita Koulutuksen arviointineuvoston edeltäjä, Korkeakoulutuksen Arviointineuvosto (KKA) kehitti 1990-luvulta lähtien, ja valinnan taustalla vaikuttanee se, että käyttöön otettu malli ei haasta hallituksen päätösvaltaa koulutustarjonnasta.

Uusien sisäisen ja ulkoisten laadunvarmistuksen järjestelmien vastaanotto tapahtui Suomessa aivan eri yhteydessä kuin, missä ideat esitettiin eurooppalaisella tasolla. Bolognan prosessi tavoitteena oli luoda yhteisiä rakenteita korkeakoulutukselle, tukea opiskelijoiden, tutkijoiden ja tutkinnon suorittaneiden liikkuvuutta, kun taas kansallisella tasolla Bolognan prosessiin liittyvät uudistukset olivat osa laajempaa uudistusten kokonaisuutta, jossa samoihin aikoihin

uudistettiin tutkintojärjestelmää, yhdistettiin pienempiä koulutusyksikköjä suurempiin, luotiin uusia johtamisjärjestelmiä yliopistoihin ja ammattikorkeakouluihin. Suomalainen malli linkitti laatutyön edellä mainittuihin uudistusprosesseihin ja samalla etäännytti yhteyttä eurooppalaisen tason tavoitteisiin.

Henkilöstön kokemukset useista samanaikaisista reformeista ja siirtyminen johtajavaltaisempaan hallintoon voivat osittain selittää henkilöstön alkuperäistä epäluuloa uusia laadunvarmistuksen muotoja kohtaan.

Tutkimuskirjallisuudessa on esitetty, että Bolognan prosessin aloittaneet hallitukset käynnistivät prosessin edistääkseen omia kansallisia politiikkatavoitteitaan, ja on esitetty, että prosessi sai vähitellen sellaisen poliittisen voiman, että se alkoi rajoittaa kansallisten hallitusten omaa poliittista pelivaraa, mikä puolestaan vahvensi Euroopan komission korkeakoulupoliittista roolia; poliittinen valta siirtyi asteittain kansallisilta hallituksilta Bolognan prosessille ja sen myötä myös Euroopan komissiolle.

Tämän tutkimuksen perusteella kuva on monimuotoisempi. Tutkimuksessa tuli esiin jännite koulutuspolitiikan eurooppalaisen tason ja kansallisen tason välillä. Kuten edellä todettiin, kansallisen tason uudistukset on usein tehty eri motiivien kuin mitä niitä ohjaavat yhteiset eurooppalaisen tason sitoumukset. Laadunvarmistuksen keskeisten termien sumeus tai hämärärajaisuus on antanut valtioille pelivaraa siinä, miten ne sovittavat eurooppalaisen tason kansalliseen kontekstiin, mikä puolestaan on johtanut siihen, että erilaisissa raporteissa ja seurantadokumenteissa on kiinnitetty huomiota eurooppalaisen järjestelmän sisäiseen sekavuuteen. Eurooppalaisen tason ja kansallisen tason jännite on tullut esiin myös siten, että jotkin Bolognan prosessin sitoumukset ja Euroopan komission esittämät kannanotot ovat pyrkineet irrottamaan laadunvarmistusta kansallisesta kontekstista, mihin prosessin jäsenvaltiot näyttävät suhtautuneen vastahakoisesti, ja ne ovat jarruttaneet tämän tyyppistä kehitystä.

Euroopan unionilla on monia mahdollisuuksia vaikuttaa prosessin etenemiseen: se on Bolognan prosessin jäsen; se voi omissa poliitikkadokumenteissaan luoda ja ylläpitää diskursseja, jotka tukevat sen poliittisia tavoitteita; se voi rahoittaa Bolognan prosessiin liittyviä projekteja, ja tällä tavoin testata ja tukea ideoita, jotka vaikuttavat prosessin suuntaan, ja näiden projektien avulla se voi luoda prosessin suuntaan vaikuttavaa poliittista painetta.

Sidosryhmiä edustavista järjestöistä esiin nousivat etenkin Euroopan yliopistoliitto (EUA) ja eurooppalaisten laadunvarmistusyksikköjen liitto ENQA. Molemmat ovat Euroopan unionista riippumattomia järjestöjä, mutta ovat saaneet Euroopan komissiolta rahoitusta Bolognan prosessiin liittyviin projekteihinsa. Prosessin kuluessa Euroopan komissio on siis tukenut organisaatioita, jotka ovat tuottaneet asiantuntijatietoa prosessin käyttöön, mutta samalla ne ovat ajaneet (etenkin EUA) omaa Euroopan komission tavoitteista poikkeavaa agendaansa.

Vaikka Euroopan unioni, etenkin komissio on Bolognan prosessin keskeinen vaikuttaja, tutkimuksen perusteella se ei ole pystynyt sanelemaan Bolognan prosessin sisältöjä. Tästä hyvänä esimerkkinä on eurooppalaisen laadunvarmistuksen

standardien määrittäminen; komissio antoi tukensa standardien ja toimintaperiaatteiden määrittelylle, mutta itse dokumentti suunniteltiin EU:n päätöksentekoprosessien ulkopuolella ja komissio oli kriittinen joihinkin sen osiin, etenkin siihen, että ensimmäisessä – vuoden 2005 versiossa – arvioinnin kriteerejä ei kytketty samanaikaisesti suunnitteilla olleisiin korkeakoulutuksen eurooppalaisiin viitekehyksiin. Muita vastaavia esimerkkejä ovat olleet komission ehdotus ulkoisten arviointien avaamisesta kaikkien eurooppalaisen korkeakoulutusalueen arviointitoimijoille, ja ajatus pienten arviointitoimijoiden yhdistämisestä kielialueittain yli valtiollisten rajojen. Edellinen ehdotus hyväksyttiin Bolognan prosessissa huomattavalla viiveellä, ja jälkimmäisen edistämisestä komissio on ilmeisesti luopunut.

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ORIGINAL PAPERS

Ι

ACCREDITATION, THE BOLOGNA PROCESS AND NATIONAL REACTIONS: ACCREDITATION AS CONCEPT AND ACTION

by

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ACCREDITATION, THE BOLOGNA PROCESS AND NATIONAL REACTIONS. ACCREDITATION AS CONCEPT AND ACTION

ABSTRACT

The article examines accreditation as a component of the Bologna Process quality policy. The focus is on an analysis of the concept of accreditation in policy documents from four countries (Finland, the Netherlands, France and Sweden). The article focuses on the following questions:

- How does accreditation appear, as a concept and as action, in national reports, produced for the purposes of the Ministerial meetings?
- How is accreditation presented, as a concept and as action, in the national context and for national actors?

1 INTRODUCTION

The Bologna Process quality policy concentrates currently on the development of comparable quality assurance systems. The participants of the process, represented by their ministries of education, are simultaneously the actors and targets in the process, as they plan the objectives on the European level and are committed to implementing them on the national level.

Accreditation is an interesting special question in the context of quality assurance. The Berlin Communiqué of 2003 presented and the Bergen Communiqué of 2005 further supported the goal of creating national quality assurance systems, which would include "accreditation, certification or comparable procedures". Here, 'accreditation' was brought into European higher education policy through the needs of transferability of degrees and labour policy. The Bologna Process has brought accreditation into European higher education policy in a way that seemed impossible in the 1990s, when any convergence of higher education systems was opposed by European Union member countries (O'Callaghan 1993).

Formally, the Bologna process quality goals appear rather unambiguous as they are represented in the process' own documents. National implementation, on the other hand, seems more problematic. (Stensaker & Harvey 2006; see also Haug 2003.) Each country works in its own historical context, with national traditions, which naturally leads to different implementations. The same would seem to apply to quality assurance, and accreditation, which is in some countries a relative latecomer in the quality assurance field. We hypothesize that in the Bologna Process quality assurance dimension, there appear to exist two opposite tensions. Firstly, the national systems seem to be converging as accreditation is brought within quality assurance. And secondly, due to national differences in the implementation of the Bologna goals, the concept of accreditation becomes (or remains) fuzzy on the European level.

This article looks into this potential conflict in the meanings and associated definitions and actions attached to the word 'accreditation'. We look

at "accreditation, certification or comparable procedures" in four different countries: Finland, the Netherlands, France and Sweden.

2 ACCREDITATION: WORD, DEFINITIONS AND PRACTICES

The word accreditation has been given various meanings, and it has been defined in different ways. Accreditation comes with various operationalisations, as various actions are attached to it. Also, there exist practices which are not named as accreditation, but which are used in similar contexts. Woodhouse (1999) defines accreditation as the evaluation of whether an institution or a degree can be awarded a particular status. Välimaa (2004) in turn defines accreditation simply as approval based on evaluation. As Kohler (2000) points out, accreditation "smacks of law" in leading to licensing.

In the European context, Westerheijden (2001) refers to the two generations of accreditation, meaning with the first generation the systems implemented in Eastern European HE systems in the early 1990s, and with the second, the accreditation systems ignited by the Bologna process, based on "European transparency". van der Wende and Westerheijden (2001) continue this analysis of accreditation around the themes of transparency and European mobility. Harvey (2004) defines accreditation as focussing either on programmes or institutions. He defines accreditation as "the establishment or restatement of the status, legitimacy or appropriateness of an institution, programme (i.e. composite of modules) or module of study." Harvey also reminds us that accreditation is neither apolitical nor neutral. (Harvey 2004, pp. 207-8).

The use of the word accreditation has political implications in the member countries. The definitions of the word make claims about how it *should* be used, rather than describe *how* it is used (see Bacchi 2000, for a further discussion of policy discourse). The definitions of 'accreditation' lead into some kind of operationalisation of it and these operationalisations may vary from country to country, depending on policy needs. In addition, the definitions and practices attached to the concept 'accreditation' construct and steer the higher education policy debate about the quality assurance, and consequently the policy actions related to accreditation. As we hypothesized, the Bologna process may extend the sphere of social action, where accreditation is applied. Thus, the Bologna Process continuously reconstructs and gives new meanings to the concept.

In this article, we look into the appearances of the word accreditation; the meanings attached to it, and the (policy) practices it denotes. In other words, we will analyse, how accreditation appears in the Bologna process

• as a word (What word is used on the national level, what word to report to the European level, about the action attached to accreditation?)

- as a definition (What kinds of descriptions are given about accreditation or related actions? How is accreditation defined in the documents?)
- as action (What practical actions have been suggested to respond to the demand for accreditation-like procedures in the Bologna process? What kinds of quality assurance related changes have been suggested?)

Our data consist of the following higher education policy documents:

- 1. Bologna process primary documents (declarations and communiqués)
- 2. national documents produced specifically for follow-up or reporting purposes of the Bologna process, and directed either for European or national audiences
- 3. national planning documents from the time before and during the Bologna process

3 NATIONAL CASES

An international process such as the Bologna process inevitably brings new impulses to national policies. Policy change is, however, also influenced by national and local contexts. On the one hand, governments demand changes modelled by international examples. On the other hand, similar demands cause different realisations in different national contexts.

The four national cases of Finland, Sweden, France and the Netherlands have been chosen partly based on our previous studies (Ala-Vähälä 2003; Ala-Vähälä 2005; Saarinen 2005a; Saarinen 2005b). The cases also represent different traditions of higher education in general and quality assurance in particular. The following presents a short review of the development of national Quality Assurance systems; the role of accreditation in QA; and the representation of accreditation in national documents on one hand, and in documents directed for the Bologna process on the other.

3.1 The Netherlands

The origins of the Dutch quality assurance policy are from the mid 1980s. The committee report "Hoger onderwijs: autonomie en kwaliteit" (Higher education: autonomy and quality) from 1985 introduced a new ideology of steering. In order to improve governance processes, the "Hoger onderwijs: autonomie en kwaliteit" suggested that the governmental steering should happen at a more general level. The new ideology of steering from remote included two elements: first, the institutions of higher education should have more responsibility for their own work; second, the new system should include an adequate system of quality assurance. (Hoger onderwijs: autonomie en

kwaliteit, 5-6.) As a result of political debates, a new higher education act covering both universities and polytechnics was accepted in 1993. The system of quality assurance, however, was implemented some years earlier by the associations of universities and polytechnics. In other words, the universities and the polytechnics had separate systems of evaluation. In the system of that time, the educational provision was evaluated discipline by discipline, and each study program in the respective field of education was audited during the evaluation process. In the university sector, these evaluations began in year 1989, and in polytechnics in 1991.

The new policy of quality assurance intended mainly at quality development, which meant that the extern audits did not result any direct sanctions. On the other hand, if the auditors estimated that the quality of education in some study programmes was not sufficient for a higher education institutions, this was mentioned in the report and the auditors gave recommendations about quality improvement. In this case, the study programmes (and their respective universities or polytechnics) had to report to the Inspection of education about their actions with respect to the recommendations. If the institution did not show any improvements, the Government could give sanctions, which as strictest meant, that the government could withdraw the study programme for the list of officially accepted study programmes – which meant that the respective diploma was no more officially recognized. (Jeliazkova & Westerheijden 2004, 304)

This system of quality assurance was not unanimously accepted by the polytechnics. This is evident from the fact that the actors of the polytechnics sector started to make proposals about a new accreditation based system already in the mid 1990s. The Brouwer commission, which discussed various questions in the field of educational supply of polytechnics, and gave its report in 1995, recommended that each polytechnic study programme having public funding needed to be accredited by an independent organization consisting of representatives from the work environment organisations, association of polytechnics and Ministry of Education and science. (Niet meer maar beter, 64) In the same year, the general meeting of the association of the polytechnics supported this statement. (Het HBO, sterk in ontwikkeling, 21)

After the mid 1990s, the system of accreditation based quality assurance started to develop step by step. In late 1990s the polytechnics started to establish their own master programmes which were not a part of the official degree system at that time. In order to create a system of quality assurance, the polytechnics created a special foundation, Dutch Validation council, which task was to give validations for the new professional master programmes. This protocol was defined as an accreditation. (Masteropleidingen. Brief bestuur HBO-raad, aan de colleges van bestuur/ centrale directies van alle hogescholen. Den Haag 11 maart 1997. See also the D.V.C. Masterregister)

In addition to this, in 1999 the association of the polytechnics, HBO-raad, started piloting the accreditation of existing polytechnic study programmes. This project was called "the experimental accreditation" (proefaccreditering).

The main motives for the piloting were stated in the instructions for experimental accreditation (protocol proefaccreditering) and in the document "Ten questions about the experimental accreditation" (Tien vragen proefaccreditering). According to them, there was a need for greater objectivity: the system that was now experimented intended at making a clear division between two main functions: first, to validate the basic quality; and second, to support the quality improvement. According to the document "Protocol proefaccreditering", the system of that time mixed these two functions together, resulting in a lack of objectivity. One point of interest is that the evaluation of experimental accreditation, which was carried out in 2002, stated that one main motive behind the piloting project was the need of international transparency in the competitive markets of education. (Goedegebuure & al. 2002, 5.) This idea of international transparency was not mentioned in the original documents, but after the Bologna declaration it strikes through also here.

The process of establishing the current system of accreditation started in 2000 when the Minister of Education set up a committee in order to discuss the principles of accreditation based system of quality assurance. (Regeling van de minister van Onderwijs, Cultuur en Wetenschappen, nr. WO/B/2000/39880, dd. 6 november 2000, tot instellen van een Commissie Kwartiermakers Accreditatie in het Hoger Onderwijs.) Already in February 2000, the Minister sent a letter establishing the committee, and in the letter gave the reasons for an accreditation based system. The letter mentioned the needs of international transparency, and referred to the Bologna declaration and the need for coordination in the field of quality assurance. At this point, there had been no mention of accreditation in the Bologna Process documentation, and consequently the Minister's letter did not claim that accreditation was demanded by the Bologna process. On the other hand, the letter did present accreditation as a natural answer to the challenges of the Bologna process. According to it, more and more countries recognized accreditation as an instrument for greater transparency and better guarantee for quality.

The committee that discussed accreditation referred to the Bologna Declaration (1999) and to the Prague Communiqué (2001) and linked the accreditation based system of quality assurance to the Bologna process. Like previous documents, it did not claim that Bologna process required an accreditation based system, but it stated that system based on accreditation had become an common way of meeting the requirements of Bologna process. According to the committee report, many countries were going to introduce an accreditation based quality assurance system in order to guarantee the quality of higher education. (Prikkelen, Presteren, Profileren 2001, 8.)

To sum up, it is evident that the accreditation based quality assurance system started to develop already before the Bologna process. When the Bologna process became a topic of discussion, it was used to legitimate the implementation of an accreditation system. Due to this, it was also natural, that the Dutch government presented the system of accreditation as their response to the Bologna process' requirement of quality assurance. The report prepared

for the Berlin meeting (Netherlands 2003) talks in detail about the goals and principles of the Netherlands Accreditation Organisation (NAO), which had been founded in 2002. In the report for the Bergen meeting (Netherlands 2005), the change of NAO into the Netherlands – Flemish Accreditation Organisation (NVAO) was reported, together with the new co-operation with the Flemish community in Belgium. In the Bergen report 2005, accreditation is reported widely.

3.2 France

In France, there are several quality assurance systems. This article deals with the systems which handle the evaluation of higher education degree programs (habilitation) and the independent evaluation of educational institutions. These systems existed already before the Bologna process, but this process has created some pressures on their development, especially on the system of habilitations. The habilitations of university study programmes have been carried out by the Ministry of Education. In addition, there are separate systems for master level engineering programmes and for economics and business administration programmes. All these habilitations give a status of an official degree – Diplome d'Etat – which means that they have official status guaranteed by the State. The independent evaluations have been carried out by the national evaluation committee CNE (Comité national d'évaluation) and these evaluations have mainly targeted at educational institutions, but CNE has also carried out some discipline based evaluations.

France was one of the initiators of the Bologna Process and one of the four signatories of the Sorbonne Declaration (1998). The report of the Attali Committee from 1999 proposed a three tier study system and a new system of evaluation: each unit was to be evaluated within a certain period, and the evaluations were intended to have an impact on their resources. The committee also proposed a new organisation for evaluation: ASE (Agence supérieure d'Evaluation). Although France soon started to develop a three tier degree system, the system of quality assurance has developed in another direction from the Attali committee's suggestions. Instead of creating a new system and organisation for quality assurance, the Ministry of Education has gradually developed the system of habilitation towards the principles of accreditation. This has implied an essential change from the "ex ante" control of study programmes towards a system of accreditation.

According to Chevaillier, until the mid 1990s the contents of university curricula were stated by the Ministry of Education, and habilitation was a kind of 'conformity check': the Ministry checked that the study programmes followed the principles stated by the Ministry. The contents were checked only once: when the institutions of higher education started their activity and/or when they applied for new study programmes. Since the late 1990s, the

situation has changed gradually, because the Government has created new types of study programmes without defining a national curriculum for them. Thus, it has become apparent that the approval should be based on expert evaluations instead of "ex ante" regulations. Chevaillier considers that this became absolutely clear in 2002, when the Government decided to renew the degree structure following the Bologna declaration. The Ministry of Education stated that the universities had to make applications for the renewal of all their study programmes. Their only guidance was the criteria that the Ministry would use for its habilitation decision. (Chevaillier, 2004, 160-161) These new habilitations are valid for four years.

As stated above, the habilitations are often presented as a French version of accreditation. (see France 2003; France 2005; cf. Chevaillier 2004). However, the idea of adapting the system of habilitation to the demands of the Bologna process has met with some criticism. The CNE annual report of 2002 states that the system of habilitation is strange for the general public and the level of its transparency is low. (Repères pour l'évaluation 2002, p. 105.) Also, the report of the state auditors considers that the implementation of the common European educational market requires an improvement of the habilitation system. Perez estimates in his article that the system of habilitation is not consistent: a study programme that has established its position, usually gets its habilitation approved, whereas new study programmes may meet stricter evaluation. On the other hand, sometimes new and/or small units of higher education may enjoy positive discrimination. (Perez 2003.)

In addition, the process of habilitation is connected to the four-year cycles of frame work agreements between universities and the government. The process proceeds so that the resource agreements are made before habilitation decisions – this indicates that the Government (or Ministry of Education) has roughly decided about the volume of education in each university already before the habilitation decision. The amount of available resources, in turn, are one criteria of the habilitation decisions. This indicates that political interests, like estimations about local educational needs, strongly affect the habilitation decisions of university degrees. This is stressed by the fact that the habilitation of university study programmes – unlike habilitations of master level engineering programmes and study programmes of economics and business administration – do not include audits (Ala-Vähälä 2005, p. 41, 64)

3.3 Finland

In Finland, evaluation became a higher education policy catchword in the 1980's. In the early 1990's the economic recession brought 'quality' to the foreground. Quality was at that time seen as a competitive factor in higher education policy. From the point of view of the academic community, quality

improvement had to be implemented while resources were cut. (Saarinen 2005a.)

The next episode in Finnish quality policy begun in the mid 1990's as quality assurance begun to be institutionalised in the Finnish higher education system. Assessment became a legal obligation, and the Finnish Higher Education Evaluation Council FINHEEC was founded. Until then, the Ministry of Education had been active in the institutional evaluation experiments. Now the FINHEEC started to take a role as a facilitator of the universities' and polytechnics' self-evaluation practices. The FINHEEC also participated in the licensing of the polytechnics and the accreditation of professional degrees. In other words, the FINHEEC fulfilled different kinds of tasks. By the beginning of the 2000's, quality in Finnish higher education policy had acquired the meaning of development of teaching on one hand and top/quality unit selections on the other. (Saarinen 2005a.)

With the Bologna process, emphasis in Finnish HE evaluation shifted from self-evaluative to quality assurance. Quality assurance has thus far been a relatively irrelevant factor. The BP demands for "accreditation or similar" lead to the development of an audit system which focuses on the quality assurance systems of universities and polytechnics. An interesting detail is that when the audits were first piloted, all piloting institutions were polytechnics, and also in the second round, only one of a total of four was a university. The audits are coordinated by the FINHEEC, which strengthens its role as a channel for Bologna Process quality assurance demands in Finland.

Until very recently, explicit accreditation schemes were not in place, or even discussed. As late as in 2001 it was stated in a Memorandum on the international strategy for higher education (OPM 2001) very clearly that there is no need for accreditation in Finland. The Ministry of Education report for the ministerial meeting in Berlin in 2003 (Finland 2003) on developments in Finland does not mention accreditation at all. The role of FINHEEC is described as facilitative. In the report for Bergen (Finland 2005), accreditation is mentioned in the context of polytechnic's licensing and of professional special degrees. The role of FINHEEC has turned into more active: it is an organiser, evaluator, auditor.

In 2006, however, the Ministry of Education published a memorandum on structural development of higher education (OPM 2006), in which it stated that new educational programmes will be accredited on the basis of their quality and on its need. While accreditation entered Finnish higher education in a fragmented manner, as detailed actions in the polytechnic sector and professional degrees and coordinated by the FINHEEC, it now seems that the Ministry of Education is introducing a comprehensive accreditation system on the programme level (OPM 2006).

In the Finnish higher education field, there seem to emerge different kinds of reactions towards audit. The sluggishness of universities on one hand and the activeness of the polytechnics on the other may have different reasons. This reminds about the Dutch situation, where accreditation begun to be developed

in the polytechnic sector. On the other hand, the strong role of the Ministry of Education is reminiscent of France. At the moment, however, we do not have the data to pursue these questions further.

3.4 Sweden

Sweden is reminiscent of the "government accreditation" also visible in Finland. Right to grant degrees was regulated as stated in the Higher Education Act of 1993, and the rights could be revoked only if certain basic criteria were not fulfilled. Also the applications of university colleges have attained a university status are processed by the Government. The major types of evaluation are institutional audits and programme evaluations. Sweden started audits in 1995, concentrating on the systematic quality work and quality culture on one hand, and programme evaluation on the other. The processes have been "owned" by the National Agency for Higher Education (HSV). (Wahlén 2004.)

The Bologna process has clearly brought pressure also to Sweden when it comes to the development of accreditation or similar procedures. The 2003 report on the advancement of Bologna goals refers to the international professional (i.e. business) accreditation. (Sweden 2003.) The report for Bergen in (Sweden 2005) describes the HSV's assessment procedures, but it also refers to possible changes in the future:

"On the basis of mutual trust and general acceptance of national assurance systems, principles and general standards for quality assurance and accreditation should be developed."

In June 2005, the Swedish Government submitted a proposition for a renewal of higher education, under the title "New World - New University". The main changes dealt with the degree system, and the new degree legislation will take effect in the beginning of 2007. The goals are very much in line with those of the Bologna process: increasing the internationalisation and attractiveness of Swedish higher education, to make the system comparable and understandable internationally, and to increase the quality of the system.

The focus of quality assurance in Sweden has, for the past 5 years, been programme assessment. The final rounds of this programme assessment are under way, and from 2007 a new system will be implemented (HSV 2006a). The proposal for a new system was published in September 2006, and will be decided on in November (HSV 2006b). The proposal covers the years 2007-2012, and it has five components:

- 1. quality audit of the institutions' quality programmes and their implementation, in a six-year cycle
- 2. some form of subject and programme reviews

- 3. continued accreditation of new programmes for those institutions that do not have the right to grant degrees themselves (this will likely concern mostly the Bologna type two-year masters degrees)
- 4. thematic evaluations of specific quality aspects (e.g. student affairs and study counselling)
- 5. evaluation of excellence in teaching and learning

Accreditation is used in Sweden only when colleges apply for university status or when higher education institutions apply for a right to grant (professional or doctoral) degrees, even if several licencing and degree granting procedures could be termed 'accreditation' (HSV 2003.) Current debates on the future of accreditation seem to agree that accreditation should be conducted by an "independent" organization, but at the moment neither professional organisations or the HSV seem to fulfil that requirement (Wahlén 2004).

4 DISCUSSION: NATIONAL QUALITY ASSURANCE AND THE BOLOGNA PROCESS ACCREDITATION DEMAND

The uses of the word 'accreditation', its definitions, and the respective policy actions vary clearly from one case county to another. The participants of the Bologna process have been forced, in the context of quality assurance, to react to the demands of creating a system of "accreditation, certification or comparable procedures". As the use of the term 'accreditation' has increased (as the process goals have become more accreditation oriented), the meaning of 'accreditation' has become fuzzier. In addition, there are strong differences in the ways the four countries have put emphasis on the 'accreditation' dimension of the Bologna process.

For instance in the Netherlands, accreditation was planned and decided on before the Bologna process. As the demands for accreditation surfaced in the Bologna process, it was used to support the original, national demands. The Bologna Process is used to legitimate a process which had begun earlier.

Finland appears to be an example of an opposite trend. Before the Bologna process, Finnish (as also Swedish) degree approval processes could be described as "governmental accreditation", which reflects the idea of higher education as a public good. Until the Bergen meeting in 2005, accreditation was either not mentioned or the need for it was explicitly denied in policy documents. Even then, the term was used only in Bologna process reporting to an external audience, and even there only situationally, in the context of licensing polytechnics and granting professional special degrees. Only in 2006 did the term 'accreditation' suddenly appear in Finnish language national documents, in the memorandum on structural development in 2006 (OPM 2006), in the context of accreditation of new programmes. It seems that the

conceptual content of accreditation has during the Bologna process extended to include audit of quality assurance, which was offered almost euphemistically in Finland to fulfil the role of "accreditation, certification or comparable procedures".

France represents a third way. France was one of the signatories of the Sorbonne Declaration (1998). The reforms ignited there concentrate on developing degree structures. Accreditation is hardly mentioned in the official documents. When it is, it appears in the reports directed at the European process, in the context of naming the habilitation system (dealing with right to award degrees) as 'accreditation' in international contexts.

In Sweden, no system with the name of accreditation has existed. However, the programme-evaluations, which have been conducted every six years, have had a possible sanction of withdrawing the licence to grant degrees. The situation in Sweden is undergoing changes as we speak.

In the beginning of this article we hypothesized that the term 'accreditation' is fuzzy in that, on one hand, national systems appear to converge towards similar terminology, but on the other hand, the definitions and operational contents of 'accreditation' become (or remain) blurry. This seems to be supported by at least the following observations.

Firstly, the term 'accreditation' is introduced differently in our case countries. In the Netherlands, where accreditation has been a policy goal quite early, the term has been adapted in a systematic manner. In Finland and in Sweden, the adaptation has been more fragmented, starting in international contexts from smaller elements of quality assurance and in national contexts mostly outside QA. In France, the term 'accreditation' was introduced relatively early in international contexts, but in the national context the old terminology of habilitation has prevailed.

Secondly, the ways in which the term 'accreditation' is linked to a particular policy action vary, not only between the case countries, but sometimes also within one country, depending on whether the context is national or international. The use of terminology and the policy actions tied to these terms also suggests that the meaning of 'accreditation' is varied. In the Netherlands, the term 'accreditation' is used both nationally and in European documents to refer to the same function. In France, the mostly Ministry-driven (with the exception of engineering and economics and business administration) action of accepting degree programmes is called habilitation in the national context but accreditation in Bologna process reporting. In Finland the term 'accreditation' has not been used nationally until the year 2006, and in Bologna reports the term has been used to describe some isolated instances of polytechnic and special professional degree licensing, which have not been termed as 'accreditation' nationally. Also in Sweden, the term 'accreditation' has not been in consistent national use, but in the Bologna reporting, it has been used to refer to some professional evaluations.

Thirdly, there are differences in the level of practical quality assurance procedures, as the role of an independent expert-auditor / evaluator varies

from country to country. In the Netherlands, the accreditation is based on the report of independent auditors. In France, on the other hand, the CNE does conduct independent evaluations, but the habilitation process (termed 'accreditation' for the European reader) is controlled by the Ministry of Education, and no audit is included. In Finland, the right to grant degrees has traditionally been given by the State, and no evaluation or audit has been included in the process. The audits if quality assurance systems have, on the other hand, been coordinated by the FINHEEC, but they do not have a licencing function. However, in 2008 things are expected to change, as the Ministry has declared that a system of programme accreditation will be implemented. In Sweden, the HSV acts as an independent evaluator, but its independence has been questioned, and the system is to undergo changes.

5 CONCLUSIONS

Although the participants of the Bologna process share some common targets, they also have to implement them in different national contexts, with different national characteristics and historical backgrounds. As a result, each Ministry of Education studied here appears to give its own interpretation of the Bologna process. In some cases the national level policy documents also depict the development of their quality assurance system in a slightly different way, depending on whether the document is intended for a national or a European reader. Thus, an analysis of the documents in question seems to confirm our original hypothesis.

The conclusions, thus, are:

- In all the countries, policy changes regarding quality assurance in general and accreditation in particular have been implemented.
- In all the countries, the starting points (the existing situations) have been different.
- In all cases, different terminology is used nationally (akkreditointi, habilitaatio, audit, utvärdering)
- In all cases, different actions have been implemented.

The goals of the Bologna Process appear uniform in the documents, but as the demands are taken to the national level, new pressures are placed on them. It remains to be seen, whether this recontextualisation (Wodak 2005) of a transnational policy is a permanent or a temporary phenomenon. The apparently similar QA goals may be presented in different ways, depending on national policy needs. Changes in policy structures do not necessarily mean that changes in policy processes would take place. Further research in the national and local levels is needed in order to see, what happens when the policies hit the departments. In any case, the consequences of a uniform demand are not uniform.

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II

BUILDING EUROPEAN-LEVEL QUALITY ASSURANCE STRUCTURES: VIEWS FROM WITHIN ENQA

by

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Building European-level quality assurance structures - Views from within ENQA

(Submitted to Quality in Higher Education)

Abstract

The article discusses the changes in ENQA's (the European Association for Quality Assurance in Higher Education) role in the Bologna process, mainly from the ENQA point of view. We argue that ENQA's development to its current status as a European Level policy maker is to a great extent a result of the European Union's policy of supporting European level cooperation and transparency in the field of quality assurance. ENQA was not the only contestant for the role it now has in European quality assurance. The EUA (European University Association) had a long time experience in quality assurance and also had its own interests in the field of quality assurance. The tension between ENQA and EUA is visible in the policy statements of these organisations and in interviews of past and current ENQA actors that were carried out for this study. In order to have a fuller picture of the development of European level quality assurance structures, we need to complement this study with further interviews from the point of view of other stakeholders, notably the EUA and the Commission of the European Union.

Keywords: Quality assurance, ENQA, Bologna Process.

1 Introduction

The article discusses the changes in ENQA's (the European Association for Quality Assurance in Higher Education) role in the implementation of the Bologna process, or the process aiming at creating a European Higher Education Area (EHEA). At the same time, we chronicle the development of ENQA into the role it now possesses in European quality assurance.

ENQA's role in the Bologna process has been referred to in several articles (see for instance Kohler 2003; van der Wende & Westerheijden 2001; Harvey 2004; Keeling 2006; Kauko 2006), but so far, systematic analyses on its development and role in European higher education policies and especially in the quality assurance policies are lacking. This article concentrates on the ENQA perspective, as is based on four interviews from previous and current ENQA steering group members and administration; and written sources such as policy statements and committee reports from the ENQA and the Bologna process. The information from interviews and documents is compared against written documentation from the European Commission (EC) and the European University Association (EUA). We intend to complement this article next with interviews with other stakeholders in the process, notably the EUA (European University Association) and the Commission of the European Union.

We are analysing the development of ENQA's role using Archer's definitions (1994: 9-11) of the kinds of policy functions that international organisations have as

- *policy instruments*, to be used to identify problems or to inform national debates, simultaneously enabling formal, diplomatic interaction between member states;
- *policy arenas*, providing a meeting place to discuss common interest, allowing for policy confrontations;
- *policy actors*, which take their place as entities in their own right, distinguishable from their member states.

This paper argues that, in Archer's (1994) terms

1. ENQA has developed, over a relatively short period of time, from a policy arena of quality

- assurance agencies to a policy actor in European quality assurance and the Bologna Process.
- 2. The role of the European Commission has been and continues to be rather strong within ENQA and in the development of its role; the Commission gives funding, and its representatives have attended ENQA steering group meetings regularly;
- 3. ENQA's development into a policy actor in quality assurance was not self-evident. Also the universities, through their European organisation, EUA and its predecessors, apparently had an interest in coordinating the European level policy of quality assurance. This, according to our interviews with former and current ENQA actors, caused tensions at some points during the development of the Bologna Process.

2 Founding of ENQA

According to our interviewees and the analysis of the documents, there were two parallel developments in early 1990s which led to the establishment of ENQA in the turn of the Millennium. First, the national quality assurance agencies had started to arrange unofficial meetings in early and mid 1990s in order to exchange information and, quite practically, to get to know each other. In most European countries, the quality assurance agencies were first established in the late 1980s or early 1990s, and these agencies were interested in establishing contacts with other agencies in order to exchange information and good practices:

Always once or twice a year some agency invited the others. Each agency paid its own expenses and the host organisation offered one dinner. And it was not ... that is, we mainly compared each others' ways of doing things. 'What are you doing, what kinds of points of views you have?' (Interviewee B)[1]

Was it about that time, when the ... [national quality assurance organisation] was founded ... this European cooperation between similar quality assurance organisations started to become firmer, and then in fact, we started to develop some kind of light network between these organisations, [...] and, in the beginning the intention was that it was a kind of learning environment or a possibility to change experiences and to learn from each other. (Interviewee C)

Quite soon, however, the network members realised that the Commission would support these kinds of activities. Some participants were not overly enthusiastic about Commission involvement in the activities of the network. On the other hand, the possibility of funding was appealing and the majority of the network was willing to take the risk.

... Was it around [nineteen] ninety six. I can't be sure. Even ninety nine is possible. But quite soon it started to take form [...] again, I can't say the exact year, but I remember that we first discussed whether to write a funding application to the Commission. And that everyone else was enthusiastic, but the Brits and Swedes leaned backwards 'no deal, we don't want the Commission here using power and meddling', but it did not take long, until it was realised that the funding we get is worth it. And nobody stayed outside ... (Interviewee B)

The second track on the development of ENQA included European Commission action on quality assurance. The Commission had funded pilot projects in order to develop evaluation methods, and to create shared features to national evaluations within some disciplines (engineering sciences, communication/information sciences, art & design). (COM, 1995.) These pilot projects were initiated by the Council of Ministers of Education already in 1991 as the Council gave a statement on improving the quality of higher education by complementing national experiences by increasing European cooperation (EC 1991).

These two parallel processes were stressed especially by interviewee A who stated that, for the Commission, the goal was to create common outlines for the evaluations; for individual quality assurance organisations, it was to learn from each other:

... there were parallel tracks for a while, and really the whole thing begun in 1994 with the European Pilot Project, which was a Commission project, and there where, I forget how

many countries there were... Nineteen? Twenty? Nineteen I think.. something like that.. were involved in an attempt to develop an evaluation method... no... yes, evaluation method which would be appropriate for each country, but would have some shared features. [....] And at the same time, in parallel with that, a number of agencies had had informal meetings, largely after the Pilot Project, because they got to know each other there. (Interviewee A)

In September 1998, the European Council gave a recommendation on European cooperation in quality assurance in higher education (98/561/EC). The Council recommended that Member States support or establish "transparent quality assurance systems", and it described some features on which the quality assurance systems should be based on. The Council also recommended that cooperation and networking should be promoted between quality assurance agencies. Both developments – the networking of quality assurance agencies, and the European push – gave the final impetus to the founding of ENQA in March 2000, in a meeting hosted by the Commission.

As an organization, ENQA was first a project, funded by the Socrates program of the EU. When it was made into an association in 2004, it took a new name of European Association for Quality Assurance in Higher Education. However, the brand name like acronym ENQA, which referred to the original name European Network for Quality Assurance in Higher Education, was kept.

The Commission's role in the process of establishing ENQA was also mentioned by the interviewees. Though the agencies themselves had common activities, at least from the ENQA point of view it was the Commission which "pushed" the organisations together.

(Interviewer: You mentioned earlier the Council recommendation from 1998 and you said that in that recommendation ... to start this kind of a network... Do you think there was this kind of a push from the ENQA or pull from the commission at that point?) Well, I think at that stage it was both actually, and I think it was a... there would have been that development anyway of some sort by the agencies, but this gave it the structure and the location and indeed the funding base, which was very useful, so it was the right thing at a right time I think, nobody argued about it. (Interviewee A)

One interviewee estimated that as the European Commission came along and offered funding, the cooperation became more organized. Gradually, the membership criteria become stricter and, consequently, ENQA took a more exclusive turn from the original open network.

And already quite early these officials from the EU came along. [...] And NN [referring to an EU official active in higher education; writers' comment] started to attend our meetings. He/she was a head of some DG in that time, [...] and he/she started to propose that if we were better organized, then the EU would give us more funding. And we met six – eight times in a year with EU support as a steering group and wrote our own regulations ... and then became this official status, and ... then we wrote these criteria for membership, that is: what criteria should a quality assurance organization fulfil in order to get the membership, and then in the course of time the criteria became stricter, and now it is quite exact. ... one can say, that now the quality assurance organizations are accredited. (Interviewee C)

3 The role of ENQA in the Bologna process

The Bologna process is not directly a European Union process, but an intergovernmental development. It is, however, an indication of European harmonisation – or, as Huisman & van der Wende (2004) rightly point out, the preferable politically correct term would be 'convergence' – which was unthinkable some 10–15 years ago. It seems that while the efforts of the European Union were seen to intervene on the national policies in an inappropriate way in the early nineties (see COM (1991) and reactions to it in O'Callaghan (1993)), the 'voluntary' efforts at harmonisation by individual countries and their ministries of education was more acceptable. In the 2000s, the Bologna process has served to release harmonisation pressures of the European Union also in quality matters (see Keeling, 2006).

Around the preparation for the Prague meeting of 2001, the Bologna Process took more

momentum in many ways. Some tensions between the different interest groups seemed to have surfaced during the preparation for the Prague meeting. Quality assurance was no longer presented as self-evidently accepted, and the presence of different stakeholders was recognised more deliberately in the Prague background documentation than in earlier reports and declarations. (Saarinen, 2005). These tensions were partly relieved by the introduction of new partners in the Process. Between the meetings in Prague (2001) and Berlin (2003), the number of participating partners and interest groups in the follow-up of the process increased significantly. The formal inclusion of ENQA in the process is one example of this development, but also European University Association (EUA), European Student Information Bureau (ESIB) and European Association of Institutions in Higher Education (EURASHE) were introduced in the process in the Berlin meeting (2003).

Since the Prague conference, one of the key policy measures in the development of the European Higher Education Area (EHEA) was the development of comparable and transparent quality assurance systems. The new role of ENQA in this field was stated in the Communiqués of Prague (2001) and Berlin (2003). The Prague Communiqué mentioned ENQA as one of potential contributors in developing the system of quality assurance, whereas the Berlin Communiqué gave ENQA the task of coordinating the creation of European Standards and Guidelines for Quality Assurance in cooperation with the other "four E's": EUA, EURASHE and ESIB. Later, the Bergen Communiqué (2005) gave ENQA and the other members of the 4E a mandate of planning the implementation of a European register of quality assurance agencies.

Especially interviewee A stressed the rapid and also – at least from his/her point of view – unexpected change of ENQA's role. According to him/her, in the beginning of the Bologna Process, quality assurance was not in the main focus. However, this situation changed rapidly. This was also the time, when the participants of ENQA started to discuss whether the Network should move ahead and become a political actor instead of the discussion forum it had been earlier (see Archer's, 1994, definitions of the functions of international organisations). According to interviewee A, the mandate given in the Berlin communiqué (2003) of coordinating the creation of the Standards and Guidelines came as a surprise to the ENQA steering group.

(Interviewer: Well, you mentioned that ENQA sort of popped up in the Berlin Communiqué surprisingly. ...) It's still a puzzle to me. There must have been discussions in the Bologna follow-up group. But they were never communicated or discussed, there was never consultation with ENQA. About any of this. But we were much excluded from the Bologna follow-up group. (Interviewee A)

This change in ENQA's role also becomes visible, when we look at the reports and other documents published by ENQA over the years (See appendix 1). During its first years, ENQA was screening the field of quality assurance and contributed to the mutual understanding between various quality assurance organisations. Since the more quiet years in the early 2000s, ENQA's publications contributed more clearly to the creation of the European Higher Education Area. During the recent years, ENQA's publications have mainly focussed on common standards.

**** PLACE TABLE 1 APPR.HERE ****

It appears that ENQA was given a central role in planning the standards and guidelines of quality assurance even though it did not actively seek this position. This conclusion is naturally based mostly on the ENQA view in this article, but the analysis of the Bologna Process and Commission documents supports it. The European University Association (EUA) on the other hand, which actively promoted that universities and their organisation should get this role, did not reach this

position. The role of EUA from the ENQA perspective will be further discussed in chapter 5. According to one of our ENQA based interviewees, one reason for choosing ENQA for this role may be that the ministers and ministries were much more familiar with ENQA and the national quality assurance organisations than with the European University Association. The interviewees stressed its close contacts with ministries and the Commission. ENQA and the member quality assurance organisations had been producing information for policy makers, and also receiving funding from them. It appears that ENQA and its member organisations, at least as seen from the inside, had closer contacts with the ministries than universities and their European association EUA.

The quality assurance agencies, or similar organisations, they are funded by ministries. And their independence, it varies. Independence is always emphasized, but if the state gives the funding, then – what is independence? But, it can be said that the ministries considered the quality assurance agencies as their own children. If you think about national quality assurance organisations, they do produce information especially for the national policy decisions. In this sense, the national interests of different countries, the minister's interests, it is quite evident. And in this respect the EUA, which is more unknown to ministers and they are not so familiar with it, it is more distant to them. (Interviewee C)

One interviewee also felt that from the point of view of the national ministries of education, quality assurance organisations were seen as more independent from universities than the EUA, which – at least from the ENQA perspective – represent the interests of its member universities.

Before ENQA, it was EUA that had, it was a kind of ... quality ... it had a profile as a higher education quality expert. But it was the universities' organisation. And ENQA was considered to be more independent, and to represent the interests of national and independent quality assurance organisations. So it was politically easier to give ENQA this kind of role. (Interviewee D)

4 The role of the Commission

Because the Commission's incentives have had an essential impact in the founding and development of ENQA, it is reasonable to ask, whether ENQA is an independent actor or Commission's tool in field of quality assurance. Some of the interviewees admitted openly that the Commission had its own motivations when it supported ENQA, and that ENQA served as a kind building block in construing the policy goals of higher education in European level.

(Interviewer: Do you have any idea about, why did the role of EU grow. What was their motivation, their interest in [ENQA's] activities?) Maybe, in a way... well yes, especially NN [referring to an EU official active in higher education; writers' comment], he/she is clever in that way that he/she doesn't reveal all the motivations, but they do have this very strong motivation of creating a European policy of higher education. And now ... have you heard when NN speaks about these, but... When he/she links together all these, the Bologna Process, reform of degrees, international cooperation and evaluations, and all other things very easily, and these are the elements, which are used in building it. And this is a kind of building block in guaranteeing the level of European higher education. (Interviewee C) ... all the time the role of quality has become more and more important in the Bologna Process. And the role of ENQA has been sort of seen from this point of view. That ENQA could be a good tool in developing European quality. The biggest source of ENQA's funding has been European Commission, the Directorate for Education and Culture, at least when I was in ENQA. Naturally, when Commission funded with quite big amounts of money, or big... but funded, anyway, and it had its own motives. But operationally we were quite independent, sure ENQA still is, but the funding came from there. (Interviewee D)

Dale (2006) suggests that EU policy in general is based on a "construction of a consensual best practise", which is done by dialogue among policy makers and experts, peer-learning activities, indicators, benchmarks, reports and analyses. (See also Commission 2007a.) If this is true of higher

education also (and why would it not be?), it would indicate that the Commission has not been interested in the actual contents of quality assurance issues, as long as ENQA has supported the larger issues of developing transparency, comparability and other European quality assurance policy meta-level goals. Some of the interviewees described the situation by saying that the Commission had not interfered with the activities so far, but they had the feeling of being financially dependent from Commission. It was probably for this reason that some of the interviewees considered that ENQA should raise the membership fees, in order to diminish the Commission's financial role:

...one of the policy directions I've been trying to pursue is trying to move ENQA away from dependence on funding from the Commission, because so long as we are heavily dependent on the Commission for funding, it's very difficult to strike an independent, entirely independent policy line which the Commission... I mean they're not BAD, they don't interfere, but they're there, they're on the committee, and they always turn up and they have views on things, so I'd much rather be entirely independent from the Commission, but that means putting our membership fees up, ... (Interviewee A)

(Interviewer: ... did you have any unofficial scenarios about what might go in good direction or how things could go wrong ...) My only worry in my time was all the time, how much the Commission was intending to steer the decision making in ENQA. [...] the Commission paid the salaries, financed the rent of our office, all these expenses. [...] And that, in a way, how much Commission would steer our activities ... I was often thinking about that. (Interviewee D)

Keeling (2006) suggests that many of the Bologna Process initiatives are "'mainstreaming' solutions first developed by the Commission". As seen from the above, this is certainly true of the quality assurance developments of the Process. The Commission also provided start-up funding for the European register of quality assurance agencies (COM, 2007); in fact, the register was recommended in February 2006 in a Council recommendation (COM, 2006). The Commission is the only non-state member of the Process, as well as a full member in the Bologna Follow-Up Group (BFUG). The weight of the Commission seems to be far greater than the principle of subsidiarity would suggest.

5. The European register of quality assurance agencies – but on whose terms?

Some of the interviewees stressed that so far, and as seen from ENQA's side, the most difficult policy issue for ENQA has been the question of the register of quality assurance agencies. They also felt that ENQA's strongest rival in this topic was the European University Association.

The tensions between ENQA and EUA become visible already in early 2000s when ENQA stressed the importance of independent quality assurance organisations whereas EUA emphasised the role of a European forum, consisting of various stakeholders, especially universities. The Salamanca declaration of the EUA (2001) was quite cautious in its formulations. It stressed the respect for national, linguistic and discipline differences, and stated that the quality assurance should not be based on a single agency enforcing a common set of standards.

On the other hand, in the conclusions of the work of thematic groups it was suggested that "some kind of European platform or clearing system need to be organised with the full support of higher education institutions in order to disseminate good practice and advise accrediting bodies on appropriate procedures." (EUA, 2001). In other words, the universities should have some kind of a direct or indirect role in defining good practices and appropriate procedures in quality assurance. The Graz declaration of EUA (2003) developed this idea further, stating that stakeholders, and in particular universities, should collaborate to establish a provisional 'Higher Education Quality Committee for Europe'. Among other tasks, this committee should "monitor the application of a proposed code of principles, developing a true European dimension in quality assurance."

In its statement of 2001, ENQA manifested quite strong suspicions towards the idea a European

Quality Committee. According to this statement, this kind of platform probably would not be able to take care of practical tasks, like monitoring pilot projects. In addition, ENQA was suspicious about its close contact to one stakeholder group; apparently the EUA:

"However, the steering group recommends that great care be taken in the composition of such a platform. On the one hand, it is doubtful whether a very diversified platform composed of members with divergent basic interests could realistically be expected to proceed towards more operational solutions, including pilot projects. On the other hand, the steering group does not believe that a platform should be the responsibility of only one of the participants, so that there can be no reason to distrust the credibility of the outcome from the start." (ENQA, 2001)

ENQA's suspicions towards the intentions of EUA also became visible during the interviews. According to one ENQA based interviewee, ENQA preferred mutual acceptance of quality assurance organisations, whereas EUA was promoting an external organisation that would monitor the work of quality assurance organisations. According to interviewee A, this reflects the unofficial policy goal of EUA to control the quality assurance agencies. From the point of view of ENQA, this seemed unacceptable.

And the register had two starting points, one of them was ENQA itself and there was a conference in Sitges in 2003 I guess... called "Taking our own medicine", which was an ENQA conference about, a workshop about how to .. how agencies should quality assure their own work. And after that came the idea that there should be regular reviews of agencies by external bodies. The parallel with that though, the EUA ... which was trying to control agencies, because part of EUA's unwritten agenda has been to control quality assurance agencies. They set up, or they... they stated an intention to set up a quality committee, part of whose function would be to have general discussions about quality and quality assurance. And ENQA might have been involved in that, invited member. But part of it was also to decide which were good and which were bad agencies. (Interviewee A)

On the other hand, ENQA shared the idea of having some kind of exclusive system of credible quality assurance agencies. ENQA stated that it already functioned as a kind of gatekeeper, but admitted that other stakeholders should not be excluded from this process. As a first step, ENQA proposed a mutual recognition of quality assurance systems. This reflected ENQA's view that quality assurance should be based on strong independent quality assurance agencies and that mutual peer reviews should guarantee their credibility. (ENQA, 2001) In its statement to the Berlin Conference, ENQA accepted the idea of a register, but proposed that ENQA should build this register, and that ENQA and the register should have membership criteria as identical as possible (ENQA, 2003b).

The European Standards and Guidelines for Quality Assurance (2005) presented a compromise which included both ENQA's and EUA's policy goals. According to it, the system would include a peer review system for quality assurance agencies, and a register of external quality assurance agencies operating in Europe, including a European register committee. The Bergen meeting (2005) discussed the Standards and Guidelines, and consequently gave ENQA and the other members of the 4E's a mandate of planning the implementation of the register.

According to one interviewee, during the register negotiations, ENQA's policy goal was that membership in ENQA should automatically guarantee entrance to the register. The EUA (2007), in turn, stressed that the register committee must have the authority of their decisions even though they may use the reviews of ENQA or other quality assurance organisations. This caused difficult negotiations because – in addition to being an expert organisation – ENQA was also representing its membership body and also its own interests. Later, however, ENQA board moved from their original position and accepted the idea that if the register were to be independent, its membership cannot be tied to ENQA membership.

And the key ways in which the members' interests have to be protected is as far as possible

to ensure that membership of ENQA carries with it as near automatic as possible entry into the register. Because one very good reason. Because the criteria for register and ENQA membership are identical. Because ENQA requires a review before you'll get it and so does the register. And one thing I was not prepared to tolerate was for there to be two parallel organisations, each separately requiring a review. [...] Now I understand why the register cannot automatically accept somebody because it would then be accepting another body's judgements. But given the register is NOT going to be in the position to be able to carry out its own reviews, then it is going to rely quite heavily on ENQA and to provide the information on which it's going to make its decision, ... (Interviewee A)

As the European Quality Assurance Register for Higher Education (EQAR) was founded in March 2008 by ENQA, EUA, EURASHE and ESU, it would seem that the expectations presented by Interviewee A in the previous excerpt came true. The Register is independent, but since inclusion in it is "based on compliance with the European Standards and Guidelines" (EQAR, 2008a), it is obvious that ENQA members will have no problem in entering it.

ENQA contributes directly and indirectly to the process of choosing the members or the Register, because the reviews of national agencies will be organized either nationally (including reviews conducted for an ENQA membership), or by a non-national body (such as ENQA), in cases where a national review is for some reason not possible.

In addition, the committee accepting the applicants for the Register will consist of representatives of the E4 (including ENQA), Business Europe, and Education International. Additional representatives of the Bologna Follow-up Group will act as observers.

The EQAR has started its activities in summer 2008. According to its web-pages, it is anticipated that the Register, containing the first round of quality assurance agencies that have applied successfully for inclusion, will be published in early December 2008. (EQAR 2008b)

6 Conclusions

In the course of the Bologna Process, ENQA gradually got a more active role in the field of European quality assurance policy. This is evident from the analysis of the various policy documents by the Bologna Process, but it is also visible in the views of our ENQA interviewees. The new role of ENQA was stated in the Communiqués of Prague (2001) and Berlin (2003). The Prague Communiqué (2001) mentioned ENQA as one of the potential contributors in developing the system of quality assurance whereas the Berlin Communiqué (2003) gave ENQA the task of coordinating the creation of European Standards and Guidelines for Quality Assurance in cooperation with the European University Association (EUA), European Association of Institutions in Higher Education (EURASHE) and European Student Information Bureau (ESIB). Later the Bergen communiqué (2005) gave ENQA and the other members of E4 a mandate for planning the implementation of what became the European Quality Assurance Register.

ENQA was, however, not the only option when the ministers in the Berlin conference chose the coordinator for the creation of European Standards and Guidelines. Also the universities, through their European organisation EUA and its predecessors, had experience in the field of quality assurance, and had interest in coordinating the European level policy of quality assurance. This caused tension between ENQA and EUA, which is evident not only in the light of our interviews with current and former ENQA actors, but is also visible in the written policy statements of EUA and ENQA.

Since the early 1990s, the European Community has had as a policy goal of supporting European level cooperation between quality assurance organisations, and this has had an essential impact in the development of ENQA. The European Commission has given financial support ENQA and high level EU officials have participated in the meetings of the steering group of ENQA. The interviewees were aware of the role of the EU, but considered that at least from their point of view, the Commission had so far not tried to steer ENQA's activities. On the other hand, some

interviewees were worried about the essential and gradually growing role of the EU.

The interviewees estimated that ENQA's position has become quite strong. From ENQA's point of view and as suggested by documents we analysed, three factors have supported this development. First, ENQA represents quality assurance organisations, which are usually funded by governments and are more dependent on the political will of governments than universities. Due to this the quality assurance agencies and ENQA are more familiar to the ministries of education than the EUA which represents European universities.

Second, since the mid 1990's, the European Commission has supported ENQA's activities, and ENQA's current role in the Bologna process can be seen as a part of a continuum in this respect. The third, and more speculative explanation, is that ENQA is a part of a system of balances and counter balances between national governments and universities. Since the Salamanca declaration in 2001, the EUA has proposed systems where the universities EUA have a central role in coordinating the European structures of quality assurance. The Commission and the Bologna ministers, however, did not give the universities this role, but instead, chose to make ENQA's role stronger. The ministers gave ENQA the task of coordinating the planning of the Register, together with other relevant stakeholder groups. However, ENQA or its members were not given a gatekeeper's role in the field of quality assurance.

The debate about the register of European Quality Assurance Agencies indicates that ENQA has grown to the limits of its power. We need, however, to complement the data analysed in this article with other interviews, especially from the EUA and the Commission, in order to gain a fuller picture the development of the European-level structures in the field of quality assurance during the Bologna Process.

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Appendix: ENQA's publications in 2001 – 2007.

Categories:

- 1
- Analyses and/or descriptions of QA systems Common standards, mutual recognition Analyses/standards of discipline based QA 2 3

Year	Name	Category	Motivations for the categorisation
2001	International Initiatives and Trends in Quality Assurance for European Higher Education	1	The report provides an outline of the international and European context in which the newly established ENQA will operate.
2001	Quality Assurance in the Nordic Higher Education - accreditation-like practices	1	
2001	Quality Assurance Implications of New Forms of Higher Education	1	
2001	Institutional Evaluations in Europe (workshop report)	1	
2002	A Method for Mutual Recognition	2	
2002	Quality Procedures in European Higher Education	2	Though this publication describes the QA systems in European Countries, it aims at providing information for the creation of "Standards and Guidelines for Quality Assurance".
2003	Benchmarking in the improvement of Higher Education (Workshop report)	1	This report discusses both benchmarking in general, benchmarking as a tool for educational development, and as a tool for quality assurance. Due to the diversity of topics it is categorised as "analyses and/or descriptions".
2004	Transnational European Evaluation Project (TEEP) - Methodological Report	3	
2004	Accreditation Models in Higher Education (Workshop report) (1)	1	
2005	Standards and Guidelines for Quality Assurance in the European Higher Education Area (2)	2	
2005	Quality Convergence Study. A contribution to the debates on quality an convergence in European Higher Education Area. (2)	2	This report is a follow up to the report "Quality Procedures in European Higher Education" of 2002, and is thus linked to the creation of the Standards and Guidelines"
2006	Mapping External Quality Assurance in Central and Eastern Europe	2	The report presents the results of CEEN member surveys that charted how far the member agencies matched up to the good practice described in the Standards and Guidelines.
2006	Transnational European Evaluation Project II (TEEP II) - Methodological Report	3	
2006	Quality Assurance of Higher Education in Portugal –	2	Results of an international experts panel appointed by ENQA which reviewed the existing Portuguese quality assurance practices and gave recommendations to the Portuguese government on the organisation, processes and

			methods of establishment of a national accreditation system which would meet the European Standards and Guidelines for Quality Assurance.
2006	Guidelines for national reviews of ENQA member agencies	2	
2007	European Standards and Guidelines in a Nordic Perspective	2	
2007	Terminology of quality assurance: towards shared European values?	2	The publication includes two thematically related reports: the workshop report on the Language of the European Quality Assurance and the final report of the second Quality Convergence Study (QCS II). Especially the second report is linked to the "European Standards and Guidelines".
2007	Report to the London Conference of Ministers on a European Register of Quality Assurance Agencies	2	
2007	Student involvement in the processes of quality assurance agencies (Workshop report)	1	This report aims mainly at sharing information about student involvement, though the "Standards and Guidelines" and the Bologna process is also mentioned in the introduction of the report.
2007	External review report of NVAO	2	

Table 1. Classification of ENQA publications in 2001 – 2007

	2001	2002	2003	2004	2005	2006	2007	Total
1. Analyses and/or descriptions of QA systems	4		1	1		1	1	8
2. Common standards, mutual recognition		2			2	2	4	10
3. Analyses/standards of discipline based QA				1		1		2
Total	4	2	1	2	2	4	5	20

Source: www.enqa.eu. See Appendix 1 for the list of publications and their categorisation.

End-note:

[1] Interview A took place in English; extracts from interviews B, C and D are our own translations.



III

AUDITS OF QUALITY ASSURANCE SYSTEMS OF HIGHER EDUCATION INSTITUTIONS IN FINLAND

by

Ala-Vähälä, Timo & Saarinen, Taina 2013

M. Shah & S. N. Chenicheri (Eds.), External quality audits: Has it improved quality assurance in universities? (pp. 183–194)

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Audits of quality assurance systems of higher education institutions in Finland

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Forthcoming in 2013 in M. Shah & S.N. Chenicheri (eds.), *External Quality Audits: Has it improved quality assurance in universities*? Oxford: Chandos Publishing.

Abstract

Systematic Finnish higher education assessment policy began to take shape during the first years of the 1990s, after related developments in the previous decades. Several separate, but overlapping developments began to appear that can be broadly described as some kind of assessment-linked policy. The increased demands for accountability in the 1980's were followed by demands for assessment in the 1990's. This was also written in the educational legislation which was renewed for all levels of education in the mid 1990's. A further step in the institutionalisation of higher education evaluation was the establishment of the Finnish Higher Education Evaluation Council (FINHEEC) in 1995. Following the developments of the Bologna Process, Finland implemented in 2005 a system of quality audits, which is, in fact, a meta-assessment of the higher education institutions' quality assurance systems. Impacts of the audits can be divided in pre-impacts and post-impacts. The main pre-impact of auditing the quality assurance systems has been that the universities and polytechnics have been obliged to build them or essentially systematize their structures. The post-impacts are much more invisible, because there are no direct sanctions.

Finnish system of higher education

Finland is a small, sparsely populated North-Eastern European country with a population of circa 5,4 million. Until 1809 it was a part of Sweden and between years 1809 - 1917 it belonged to the Russian empire as an autonomous Grand Duchy, gaining independence in the aftermath of the Russian Revolution in 1917. Finland became a member of European Community in 1995 and was one of the initial signatories of the Bologna declaration in 1999.

The oldest and currently biggest university in Finland, University of Helsinki, was founded in 1640. At that time it was located in Turku and named the Royal Academy of Turku, referring to the royal court of Sweden. In 1827 - Finland now under Russian regime - the university was moved to Helsinki along with the central administration of the Grand Duchy of Finland, and developed gradually into the current University of Helsinki. (Klinge 1987.) First technical and business education units grew gradually from small institutes which were founded in 19th century: Helsinki School of Economics was founded in 1911 and Finnish University of Technology (Helsinki) was founded in 1927. University of Art and Design was founded in 1973, but its history goes back to 19th century too. During the 20th Century, the university network expanded to cities outside Helsinki, and since the 1960's and early 1970's, following a period of regional higher education policy (Kivinen et al., 1993), every Finnish region has had its own university.

Since the early 90's, the Finnish system of higher education has been a dual system, consisting of research universities and polytechnics. Polytechnics were founded in early 90's. They were merged from small post secondary education units, giving commercial, technical, social or other working life oriented education. First they had bachelor level degrees, and from early 2000's some (polytechnic) master degrees. (Neuvonen-Rauhala 2009.)

The new Universities Law (558/2009) was passed in 2009 and took effect in the beginning of 2010, making Finnish universities either independent corporations under public law or foundations under private law. Due to a process of structural development (i.e. mergers) that is currently taking place both in the university sector and the polytechnic sector, the amount of universities has decreased from 20 in 1990 to 16 in 2011. In this context, the current quality audits thus takes place in a bigger, and in some respects fundamental, change process in Finnish higher education.

Brief background of government policy on external quality audits in Finland

Assessment became a focal Western higher education policy concept in the turn of the 1980s, as massification of higher education systems (Trow 1974) and decreasing resources, brought by a global recession, turned the decision makers towards considering the qualitative and quantitative offer of higher education. According to for instance Barnett (1992), the demand for assessment in fact reflects a fundamental change in the relationship between the society and higher education institutions, as mutually acknowledged trust gave way to demands for transparency and externally demonstrated accountability.

Finland followed suit relatively early, in the late 1970s. The Academy of Finland, which is the main actor in public research funding, had started its research evaluations already in the late 1970s, and it still has the same duties in the current division of higher education assessment labour. The development of higher education assessment begun in the early 1980s with the development of performance indicators. Compared to many Western European countries, however, systematic evaluation of Finnish higher education started in a different kind of economic context: while most other countries started to demand accountability and assessment during an economic recession, in Finland higher education budgets were still on the increase. The economic recession begun in Finland only in the beginning of 1990s, as the first actual institutional and study programme evaluation experiments started. (Saarinen 1995a.)

In the 1980s, also the management principles and practices of Finnish Universities changed, as the first so-called management by results experiments were initiated in Finnish governance, and first universities took part in the experiments in the beginning of the 1990s. As is customary in Finnish education policy, also this experiment became permanent (see Välimaa 1994), and by 1994, all Finish universities had entered the new steering system.

Systematic higher education assessment policy began to take shape in Finland during the first years of the 1990s. Several separate, but overlapping developments began to appear that can be broadly described as some kind of assessment-linked policy. The increased demands for accountability in the 1980's were followed by demands for assessment in the 1990's.

The first university assessment experiments took place at the universities of Jyväskylä and Oulu. They were initiated in 1991, and implemented in slightly different ways (Saarinen 1995a). Their general purpose was to collect information to make universities more efficient; to analyse the organisation of universities and their ability to response to the challenges in the operating environment; and to collect information to systematize assessments. The University of Jyväskylä approach was self-evaluative, while the Oulu experiment followed more the Ministry of Education administrative steering (Välimaa 1994.) Simultaneously, study field evaluation experiments had also been launched, linking Finland at that time with the Dutch tradition (Westerheijden & al, 1994).

As the first experiments for systematic higher education evaluation begun around the same time as the steering of higher education changed, it can be said that assessment and management by results had been institutionalised in the Finnish higher education system by mid 1990s. While evaluations have not been used to redirect funding directly, performance based reward funding has been allocated to successful departments withing the new steering system of management by results.

Educational legislation was changed in all levels after mid 1990s, to include demands for assessment. A central content of the 1997 University Law's (L 645/1997, 5§) assessment paragraph is that universities have to assess themselves; they have to publish the central results; and they have to participate in external evaluation. A further step in the institutionalisation of higher education evaluation was the establishment of the Finnish Higher Education Evaluation Council [FINHEEC] in 1995. (Saarinen 1995a; Saarinen 2005.)

Role of the national quality assurance organisation - Finnish Higher Education Evaluation Councin (FINHEEC)

Until 1995, the evaluations were coordinated by the Ministry of Education. The Finnish Higher Education evaluation Council (FINHEEC) was established in 1995. Since its foundation, it has carried out a quite broad range of types evaluation. Based on an analysis of FINHEEC's publications in 1997-2010 (Table 1), the main types of its evaluations have, during the history of the organisation, been as follows:

- 1. Evaluations of study fields: usually covering most of the educational units within the respective field, both in research universities and polytechnics.
- 2. Institutional evaluations. Evaluation of an individual research university or polytechnic

- 3. Audits of quality work, they were carried out before 2005, and were targeted only to polytechnics. These audit were smaller and more of experimental nature than the system of auditing the quality assurance systems.
- 4. Audits of quality assurance systems. From 2005, Finnish response to the statement of Berlin Declaration, stating that each participating country should have a system of accreditation or similar system
- 5. Evaluations of regional impact
- 6. Evaluations of units of educational excellence
- 7. Benchmarking and development projects
- 8. Assessment of applications for operating licences. General operating licences and licences for giving specific polytechnic master degrees.
- 9. Various thematic evaluations

Table 1: Historical Perspective: Number and type of evaluations, 1997-2010

Year	1997 - 1998	1999 - 2000	2001 - 2002	2003 - 2004	2005 - 2006	2007 - 2008	2009 - 2010		
Туре	Numbers								
Study field evaluations	1	6	7	6	1	1			
Institutional evaluations	4	9	7	5					
Audits of quality work, UAS	1	9	1	1					
Audits of qa systems					6	13	21		
Ev. of regional impact	1	1	2	1					
Ev. of educ. excellence	1	3	2	3	3		3		
Ev. operating licence (UAS)	1	1	1		1				
Benchmarkings, projects		2	2	1	3	2	1		
Other thematic evaluations	2	2	5	2	2	1	1		

As Table 1 indicates, FINHEEC has quite regularly carried out thematic evaluations, benchmarking projects and assessment of units applying the status of educational excellence is its years of activity. In late 90's and in the first years of the next decade it was quite active in institutional evaluations and study field evaluations. This type of quality work stopped in 2005 as the FINHEEC implemented the system of auditing the quality assurance system, which has since then been the main focus of its activities. According to decision of FINHEEC, all HEIs

will be audited during years 2005 - 2012; each audit is valid for six years, and the second round of audits starts in 2011 (FINHEEC 2010a, 13 - 14). The process of implementing audits coincided with the tightening of the Bologna Process goals of implementing "accreditation or similar" in member countries. (Saarinen & Ala-Vähälä 2007.)

Finnish higher education audits do not target the actual goals or results of the institutions, but rather the processes of quality assurance. In other words, Finnish audits are meta-evaluations of institutional quality assurance systems. The audit manual of Finnish Higher Education Evaluation Council (FINHEEC 2005) defines audit as follows:

Auditing is independent external evaluation to ascertain whether a quality assurance system conforms to its stated objectives, is effective and fits its purpose. Auditing does not address the objectives or the results of operations as such but evaluates the processes that the Higher Education Institution uses to manage and improve the quality of its education and other activities. (FINHEEC 2006, 31)

According to the Audit Manual (FINHEEC 2006) while audits are external, they do not have any (strict) external standards or references. They are, as has been customary in the Finnish Higher education evaluation tradition (Saarinen 1995a; Huusko 2009), improvement oriented.

The audit process consists of documentation (including self evaluation) and an audit visit. The external audit group makes a public report of the audit visit and the Finnish Higher Education Evaluation Committee decides, whether the quality assurance system works properly or if there will be a re-audit after some years. In other words, there are no direct sanctions, but if the HEI has not passed the audit, it needs to take a re-audit. So far, there has not been a case where a HEI does not pass the re-audit. During the first round of audits there were rules for handling this situation, but the audit manual for years 2011-2017 states that in that case the respective HEI and FINHEEC shall agree about a new audit. (FINHEEC 2010b, 24.)

Current legislation states that HEI must submit its quality assurance system to extern audit (Universities Law 558/2009, Polytechnics Law 351/2003 and its amendment of 564/2009). While there were no legal obligations to higher education institutions between years 2005-2009 to invite an external audit group, the status of audits was very strong. The academics did not take into consideration the challenging the necessity of audit or considered that avoiding the duties of quality work would cause problems in resource negotiations with the ministry of education. Their suspicions were not without reason, because the Ministry of Education followed the quality work of universities and polytechnics and reported their findings and quality assurance was one potential topic in resource negotiations with university management. (Ala-Vähälä 2011)

Even before 2005, many polytechnics had small audits of their quality work. FINHEEC has also assessed their applications for permanent operating licences and also for master level

programs. This indicates that FINHEEC has contributed to the formation of current system of polytechnics and due to this they have a longer history of quality management than research universities.

How do the audits impact quality management

The impacts of audits differ between research universities and polytechnics. Most universities did not have an all embracing quality assurance system before the current system of audits. In other words, they were obliged to create or systematize the quality assurance systems in order to pass the audits. From the point of view of research universities, setting up a system of audits meant *de facto* that FINHEEC introduced a new structure of quality management to this sector of higher education. (Ala-Vähälä 2011.)

From the point of view of polytechnics, the role of audits appears to be slightly different. They got their operation licences through applications, which were assessed by FINHEEC; the same procedure was used also with the licences for providing master level programmes. As stated above, there were smaller audits of quality work before the system of audits was established. (Ala-Vähälä 2011, See also table 1.) So, in the case of polytechnics, various audits and other assessments have supported the building of quality assurance management already since the late 1990's. This does not mean that audits would have been much easier projects for polytechnics than universities; they needed to develop their quality assurance systems as well, and audits were considered a challenging process. Nevertheless, quality work had a longer tradition in polytechnics than in research universities, it was more widely accepted, and audit was considered as a tool for developing it. In research universities, interviewees and survey respondents considered audits more as a one time exercise. (Ala-Vähälä 2011.)

Audits and educational outcomes

Between the years 2005 - 2011, assessment of the outcomes of teaching and research was left outside audits. It was considered to belong to the traditional quality assurance institutions of academic community and also to external evaluations, organized by the HEIs themselves. This is stated in the FINHEEC Audit manual by saying that "auditing does not address the objectives or the results of operations as such" (FINHEEC 2005, 31; FINHEEC 2007, 27) the new audit manual for years 2011 - 2017 has skipped this phrase, which indicates that the educational outcomes may in future become an object of extern audit (FINHEEC 2011, 39). Nevertheless, the focus of audits is still on processes, not in outcomes.

As stated above, the Academy of Finland, which is the main public funder of research, also organizes evaluations about the level of research in Finland. Naturally, there are the traditional control and assessment methods of scientific community, like peer reviews in publishing, and procedures that guarantee the academic qualifications of applicants to various research and teaching posts. In addition, universities and polytechnics need to guarantee that the products

and services that they sell via their commercial services meet the required quality standards. So, there appears to exist three concepts of quality in Finnish institutions of higher education:

- 1) traditional academic quality: student achievement and its assessment; quality of scientific work, assessment connected to funding of research projects;
- 2) quality of commercial services (research services, development projects etc; quality of industrial projects and commercial services); and
- 3) quality connected to management, monitoring and development of university as an organization that is: the quality assurance system that is to be audited.

Interviews and surveys indicate that there are certain tensions between the "managerial" concept of quality and the traditional concepts of academic quality assurance. Audits may have had positive impacts to the managerial processes of universities and polytechnics, but their impact to the assessment of student achievement, research or commercial services appears to be weaker. Top management in research universities and polytechnics felt that quality assurance systems and their audit gave support to their work, whereas especially university researchers found that quality work increased external control and added labor, but did not support their own work. Some interviewees from a polytechnic working in the commercial services criticized the principles of quality management of being too general and not meeting the needs of quality management in the level on customer-interface. (Ala-Vähälä 2011)

Students' role in quality management

In the Finnish system, student experience is used in all levels of auditing. Student representatives participate in audit groups. Ala-Vähälä's interviews indicate also that student representatives have actively participated in the process, where the higher education institutes trimmed their quality assurance systems in order to pass the audit. One interviewee, active in the student union, estimated that audit was for their organization a kind of tool for lobbying for their interests in the university administration (Ala-Vähälä 2011)

On the other hand, student feedback systems, though formally existing, did not work properly. Either the data was not collected for analysis or the students were not motivated to give their feed-back. According to one vice rector, student feed-back was mainly used when teachers developed their own teaching, but it did not have an impact on strategic planning. (Ala-Vähälä 2011)

The impact of audits at national, institutional and faculty level

According to Ala-Vähälä's results (2011), the impacts of the audits can be divided in preimpacts and post-impacts. As stated above, the higher education institutions - especially research universities - have been obliged to create quality assurance systems in order to pass the audits. So, the main pre-impact of auditing the quality assurance systems has been that the universities and polytechnics have been obliged to build or essentially systematize their structures. The post-impacts are much more invisible, because there are no direct sanctions.

Saarinen (1995b) found a similar pattern in her study of the first institutional evaluations in the early 1990s. In the first assessment experiments of the mid 1990s, impacts were various, and in some cases, not immediately recognized as such by the university staff. It seems that, for one thing, evaluations created an arena for organizational communication and knowledge transmission. Assessments, in other words, provided a legitimate discussion forum for issues such as the structural development of higher education. Assessments also helped formulate and articulate departmental identities; an impact also reported by Huusko (2009). Haapakorpi (2011) has also noticed that building quality assurance systems and preparing for audits makes various more or less hidden processes visible, and in that way preparation for audit makes them easier to comprehend and supports institutional identity.

However, experiences varied according to the individual's position in the academic community. Top administrators had most positive experiences of audits and quality work. Most critical were university researchers who expressed a general feeling of "alienation" towards audits, quality assurance systems and also other administrative procedures. (Ala-Vähälä 2011.) Academics in dean's positions or in similar middle level managerial positions varied in their opinions, probably according to their commitments, whether as members of the academic community, actors in a local environment (in the case of polytechnics) or policy actors in the level of central administration. (Ala-Vähälä 2009)

The future challenges of higher education quality assurance

Finland tends to follow keenly European and OECD policies (see for instance Saarinen & Ala-Vähälä 2007; Kallo 2009). With the directions the Bologna process is taking and the new OECD higher education assessment programme AHELO, we would predict a strengthening of individual aspects of quality assurance on one hand, and clearer turn towards discussing quality of learning (as opposed to assessing the mechanisms assessing it) on the other.

The first round of audits will be closed in 2011. The old system has been quite all embracing, covering all activities of HEIs, whereas the new system puts more stress on graduate education. The focus will still be on quality assurance procedures, but the new audit instructions (FINHEEC 2010b) may give room for more outcome oriented evaluation.

A major challenge for the development of the audit system is presented by the apparent frustration with the increased work load it brings about. This seems to be a shared way of thinking, especially in research universities, where it may even threaten the legitimacy of quality assurance management. Consequently, it seems that the system will need to be

streamlined, in the light of this feeling of frustration. This would also help make the potential benefits of quality assurance management more visible to teachers and researchers, too.

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IV

RECEPTION OF THE QUALITY ASSURANCE COMMITMENTS OF THE BOLOGNA PROCESS IN FINNISH HIGHER EDCUATION INSTITUTIONS

by

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Reception of the quality assurance commitments of the Bologna process in Finnish higher education institutions

Abstract

This article analyses Finnish higher education institutions' reception of the implementation of the new quality assurance systems that governments participating in the Bologna Process have committed to establishing in the Berlin Communiqué (2003). The data was collected using a websurvey, and the respondents were classified with a cluster analysis.

The reception was more positive in the polytechnics than in the research universities, and women were more positive than men. People working in managerial positions were most positive about, and committed to, quality assurance. Most critical were young researchers in research universities working in temporary jobs. Some opinions were so strongly shared that respondents with short work experience expressed their opinions, even though they could not have personal experience of the topic in question. In some topics, respondents without personal experience, but having a critical attitude tended to give their opinion, whereas those with neutral attitude rather abstained from commenting.

Keywords: Bologna Process; Berlin Communiqué; quality assurance; implementation; university personnel.

Introduction

This article analyses the reception of the new quality assurance structures that governments participating in the Bologna Process have committed to establishing. In this context, reception pertains to the following three topics: first, the respondents' assessments of the main motivations for building the quality assurance systems; second, the respondents' general attitudes toward quality assurance; third, the respondents' commitment to, and expertise in, quality work.

Alongside the quality assurance systems and their audits, carried out by the Finnish Higher Education Evaluation Council (FINHEEC), was the Finnish response to the aim of implementing the 'accreditation or similar procedure' of external quality assurance in member countries, as stated in the Berlin Communiqué of 2003. Due to the fact that systems of quality assurance were either rudimentary or completely non-existent in Finnish research universities, setting up audits of the universities' quality assurance systems first necessitated their creation. Polytechnics already had a tradition of quality work and various kinds of audits but developing the system of quality assurance was also a challenge for them (Ala-Vähälä, 2011).

Since the early 1990s, the Finnish system of higher education has been a dual system consisting of research universities and polytechnics. Polytechnics were founded by merging vocational post-secondary education units. They had been owned by municipalities, foundations and other societies but their main funding has come from the government, which also grants their licences to provide

education. From the 1970s to 2009, all research universities were public institutions. In 2009, the new Universities Law (558/2009) made Finnish universities either independent corporations under public law or foundations under private law. Before 2016, Finnish higher education institutions did not have the right to demand tuition fees but from 2016 they can require fees be paid by students coming from outside the EU and the European Economic Area (Laki yliopistolain muuttamisesta, 1600/2015. Laki ammattikorkeakoululain muuttamisesta, 1601/2015).

According to Talvinen (2012), the new quality assurance systems in Finland consist of descriptions of procedure in quality manuals, systems for gathering information (data, feedback), and systems for improvement-oriented planning, which is usually a version of the Deming Cycle of Total Quality Management that includes the following steps: Plan, Do, Check, Act (PDCA). Talvinen (2012) also stressed the close connection between quality work and management in an ideal system of quality assurance.

The implementation of the Finnish system of audits has been discussed in Eklund (2013) and Haapakorpi (2011). These studies analyse the political context of audits; especially Eklund's study and, in the case of Haapakorpi's study, the impacts of audits in different disciplinary contexts are considered. Several studies mention academic personnel's experience of increased workload and the frustrating amount of work that is required in comparison to the perceived benefits of quality assurance and they also highlight the demoralising effects of implementing such a new system (Haapakorpi, 2011; Hoecht, 2006; Anderson, 2006; Newton, 2002). Rinne *et al.* reported on increased workloads, the incompatibility of the concept of quality assurance and academic work, and the experience of polishing a university's image rather than improving the quality of its education (Rinne *et al.*, 2012).

Ala-Vähälä (2011) and Ala-Vähälä and Saarinen (2013) stated that the people working in polytechnics have more positive attitudes towards quality assurance than those working in research universities. In general, people in managerial positions, especially in top management, are the most receptive of this type of quality assurance, while researchers working in research universities are the most critical.

Cardoso *et al.* (2012) mentioned that academics tend to support quality assessment mechanisms aiming at improvement rather than control. This support is slightly higher among female academics and among academics from public polytechnic institutions, from medical and health sciences, and among people with previous experience in quality assurance activities. Rosa *et al.* (2012) stressed that academic personnel may accept improvement-oriented quality work but are critical of demands for external control or accountability, especially demands for meeting standards that are defined by those outside the academic community. They may also believe that external quality assurance does not fully grasp the nature of academic work.

According to Newton (2000; 2002), academics who participate in the implementation of the quality initiatives insert their own interpretations of the quality system when they are able to contribute. In that sense, they are not passive recipients of management objectives; instead, they shape the quality policy as they participate in its implementation. Newton also mentions a 'gap' between academic managers and other academics, with the former having more positive attitudes towards quality assurance than the latter. On the other hand, Brunetto and Farr-Wharton (2005) suggested that if the financial support provided for the implementation of the new quality system is lacking, academics in managerial positions do not implement the system at the operational level, even though they may make formal policy statements in support of the quality initiatives.

In sum, previous research has covered topics related to the modes of implementing new structures of quality assurance and various types of critical attitudes towards new systems of quality assurance. However, a systematic analysis of how university personnel have accepted or rejected the new forms of quality assurance has yet to be undertaken. Ala-Vähälä (2011) and Cardoso *et al.*

(2012) have discussed the differences between various personnel groups but these results require further analysis because they do not reveal what specific kinds of personnel are under discussion. Although numerous studies have addressed the recent changes in the structure of academic professions (Nyhagen, Mathisen, & Baschung, 2013; Hakala, 2008; Akskling, 2001; De Veert, 2001; Shattock, 2001), the problem of classifying university personnel has not been discussed in this context.

Target groups, collection of the data, response rate

This study is based on data collected in 2009 from four Finnish multidisciplinary research universities and four polytechnics. At that time, all the higher education institutions surveyed had built their quality assurance systems and gone through the audit process.

The data was collected using a web-based survey. To recruit participants from research universities, the invitation to take part in the survey was sent to administration and support services personnel and to the personnel in faculties of social sciences at all the universities, personnel from educational sciences at all the universities, and personnel from the natural sciences at three universities, and faculties of law in two universities. To recruit participants from the polytechnics, the invitation was sent to administration and support services personnel and to personnel in four fields of study: social services, health, and sport; technology, communication, and sport; social sciences, business and administration; and culture (in three polytechnics). These fields of study were selected because they offered a broad range of courses and were provided in the majority of the higher education institutions that were willing to participate in this study.

From the research universities, the survey received 511 responses, which was quite low at 8.9% of the total amount of the personnel. From the polytechnics, the response rate was a bit higher, at 21.3% with 390 responses (Tables 1 and 2). Lecturers were overrepresented in both groups and non-academic personnel were underrepresented in research universities. Although the response rate was relatively low, the total number of respondents was quite large, which makes it possible to explore their various attitudes connected to quality assurance.

Table 1. here

Table 2. here

Classification of the respondents

Due to their different historical roots, job titles and working contexts differ between polytechnics and research universities. Therefore, it is reasonable to expect that the personnel groups are not homogenous and that their tasks and professional roles may overlap. In order to resolve these incompatibilities, the respondents were classified using cluster analysis.

The cluster analysis was carried out using a hierarchical cluster analysis (Ward's method). The criteria were measured using squared Euclidean distances and values standardised to z-scores, and this was based on the responses to the following statements or questions:

- 1. Research activities: 'I carry out research full-time or part-time along with other activities'.
- 2. Research and development (R&D) activities in co-operation with companies: 'I participate regularly in the research or development work that is undertaken together with private business or public administration'.
- 3. Commitment to own institution: 'I participate actively in various working groups, teams, networks or decision forums that have an impact in the activities of my university or polytechnic'.

- 4. Networking and contacts with colleagues: 'I meet regularly people with same expertise in national or international forums'.
- 5. Networking and contacts with companies, business organisations, and public sector representatives: 'I keep regular contact with private companies, public sector units or representatives of business federations'.
- 6. Age.
- 7. Level of education: doctoral degree (1 = yes, 0 = no).
- 8. Managerial or expert position (1 = yes, 0 = no).
- 9. Teaches (1 = yes, 0 = no).
- 10. Permanent full-time job = 1; other types of jobs (temporary jobs, part-time jobs etc.) = 0.

The variables were selected so that the analysis would make it possible to classify the personnel according to their various commitments, academic or administrative careers, level of education, and networking activity with various stakeholder groups. The analysis yielded eight clusters, as follows:

- 1. Research-oriented academics: mainly professors and university lecturers from research universities and some principal lecturers from polytechnics.
- 2. Research and development-oriented academics: mainly lecturers and experts from polytechnics doing R&D work with companies.
- 3. Lecturers and other teachers: from research universities and polytechnics, usually not doing research or R&D work.
- 4. People in managerial positions: either academic or administrative personnel.
- 5. Academically-oriented young researchers: usually without doctoral degrees; weak connection to their institutions; all (except one) were from research universities.
- 6. Personnel in administration or support services without managerial positions.
- 7. Personnel in administration; participating actively in development work at their institution and networking with colleagues outside their own institution.
- 8. Research and development-oriented young researchers: from research universities and polytechnics; doing academic research and R&D work.

The number of clusters was capped at eight because this made it possible to separate Cluster 8 (young R&D-oriented researchers) from Cluster 2 (R&D-oriented researchers and teachers). Adding a ninth cluster would have split the first cluster (research-oriented academics) into two clusters, which would have only differed slightly by average age and levels of commitment.

Table 3. here

Data analysis

The data that measured attitudes consisted of a series of statements that were assessed by the respondents by choosing one alternative in the Likert scale (ranging from 1 = totally disagree to 5 = totally agree). They were also given a sixth option: 'cannot say', and it was possible to proceed with the survey without giving any response to the statement. The statements with high response rates were typically those that expressed general level opinions about quality assurance or the respondent's work environment. Statements that required some specific experience or activity received the lowest response rates.

In some cases when there was a low response rate, the respondents who were critical of quality assurance were willing to give their opinions even if they did not have direct personal experience with the topic. A good example of this is the statement 'The quality assurance system of our university or polytechnic was presented to the audit group truthfully, including its strengths and weaknesses'. In research universities, respondents who were not interviewed during the audit did not usually give their opinion on this but those who were not interviewed and did give an answer were much more critical of it than those who were actually interviewed during the audit.

Some statements revealed more common ways of thinking that reflected the respondents' own experiences. As an example, in research universities, even those whose careers were quite short shared the sentiment behind the statement: 'I feel that various changes and reforms take year by year more time from my real work'.

The actual analysis of the respondents' attitudes consists of three topics selected from the survey: respondents' assessments of the main motivation behind the creation of the quality assurance systems; respondents' general attitudes towards quality assurance; and respondents' commitment and expertise regarding quality work. These topics were chosen because they cover three basic questions related to the reception of the systems. Each topic was analysed with a sum variable consisting of three statements that measure the attitudes toward the same topic from different points of view. The coherence of the sum variables was tested with Cronbach's alpha test. The values of the alpha tests were between 0.736 and 0.760, which is not high, but still acceptable.

Respondents' assessments of the main motivation behind the creation of the quality assurance systems were measured with a sum variable that consists of the following statements, all of which measure the experience external necessary to build these systems (Cronbach's alpha: 0.760):

- In my opinion, the quality assurance system of our university has been established primarily because ministry of education or similar institution requires it.
- The quality assurance system of our university or polytechnic was built primarily in order to pass the audit.
- In my opinion, the development work of our quality assurance system stopped after the audit.

Only 18% of the respondents belonging to the cluster 'young researchers' in research universities gave an answer to these questions, which indicates that most of them were cautious about commenting. In general, the last two statements had relatively low response rates from personnel at research universities (58% and 54%) and, due to this, they may have suffered from the kind of negative bias that was discussed above. However, in this case there were no essential differences between those who had participated in the development of the quality assurance systems and those who had not.

The respondents from research universities believed that the creation of the quality assurance systems was due to external pressure (Table 4). The polytechnic teaching staff belonging to Clusters 1 and 2 shared similar opinions but the respondents in Clusters 4, 7 and 8 (in other words, people in

managerial positions, in administrative positions with relatively high levels of networking, and R&D-oriented young researchers) did not stress the role of external pressure as much as people in similar clusters from the research universities.

Table 4. here

Differences between clusters were tested with one-way ANOVA and were statistically significant in both types of institutions.

In addition to the external pressure, respondents usually assumed that the systems of quality assurance were created in order to support the work of the universities' management. Respondents in all clusters shared the belief that 'In my opinion, the quality assurance system has been build primarily to support the activities of the management of research university or university of applied sciences'. Similar statements relating to other parts of higher education institutions received lower scores, especially from people in managerial positions at polytechnics. This indicates that the management in the polytechnics tend to see quality assurance as a common interest of all personnel; whereas other personnel consider it as a tool for university management.

The second part of the analysis discusses the general attitudes towards quality assurance. This topic was measured with a sum variable consisting of the following statements (Cronbach's alpha 0.736):

- In my opinion, my university or polytechnic needs a good quality assurance system in order to function properly.
- In my opinion, it is good that we can unify the ways of working in my university or polytechnic with the help of our quality assurance system.
- In my opinion, the quality assurance system supports well my work.

In these statements, the response rates were relatively high, so the risk of bias is quite low. The personnel in research universities were more critical of quality work than their colleagues in the polytechnics (Table 5). Personnel in managerial positions in the polytechnics tended to agree with the statements, whereas the personnel in the same cluster in the research universities were more hesitant, despite this being one of the most positive clusters. Researchers in research universities (Clusters 5 and 8) were the most critical, but many of them refrained from responding.

Table 5. here

Differences between clusters were tested with one-way ANOVA and were statistically significant in both types of institutions.

The third sum variable gives information about the respondents' commitment to, and familiarity with, quality work. It consists of the following variables (Cronbach's alpha 0.756):

- In my opinion, I'm quite familiar with the quality assurance system of my university or polytechnic.
- I participate actively to the maintaining of our quality assurance system by updating its contents or by contributing in some other way to its maintenance.
- I use regularly one or more elements of our quality assurance system, like process handbook, student feedback system or other systems of controlling or feedback.

Because the rate of response to these statements was high, the risk of bias is rather small. This sum reveals the same systematic differences as the sum variable of the general attitude towards quality assurance. All the groups from the polytechnics were more familiar with quality assurance systems than the corresponding groups from the research universities, although in the second cluster, the

difference is not statistically significant (Table 6). Differences between personnel groups within research universities and polytechnics are greater than they were in the previous topic. At research universities, researchers in Clusters 5 and 8 are the most alienated from the quality assurance process. In general, levels of familiarity with, and commitment to, quality assurance seem to be quite low in research universities. Unlike the previous topics, the majority of the young researchers gave their assessments of the statements pertaining to this sum variable.

Table 6. here

Differences between clusters were tested with one-way ANOVA and were statistically significant in both types of institutions.

People in managerial positions at research universities assessed their expertise and commitment almost as highly as their colleagues at the polytechnics but their attitudes tended to be more critical. For the polytechnics, the clusters relating to administration and support services (Clusters 6 and 7) had different scores rating their commitment to, and familiarity with, quality assurance but they demonstrated almost the same level of acceptance of the quality assurance system. The responses of research-oriented academics (Cluster 1) and teaching-oriented academics (Cluster 3) at research universities reveal the same pattern. This indicates that the relative level of expertise does not explain general attitudes toward quality assurance, see also Cardoso *et al.* (2012).

In addition to the type of institution and the clusters, gender also has an impact on the reception of quality assurance (Table 7). Women did not emphasise external necessity as a motivation to build quality assurance systems as much as men; and, in general, they had more positive attitudes towards the quality assurance and assessed themselves more familiar and committed to it, see also Cardoso *et al.* (2012).

Table 7. here

Female respondents in all clusters gave higher scores when asked if quality assurance increased transparency at various levels of university administration. In the polytechnics, women in all clusters gave higher scores than the men when asked how actively they had participated in the building of the quality assurance systems. In the research universities, a similar phenomenon was witnessed in Clusters 1, 2 and 4; that is, in clusters where the respondents had to take some responsibility for the creation of the quality assurance systems.

Respondents in central administration had more positive attitudes toward quality assurance than respondents from other units. There were also statistically significant differences between the responses from members of faculties in research universities and those from fields of study in the polytechnics. At the research universities, these differences may be partly explained by the different proportion of young researchers among the respondents. Consequently, an in-depth analysis of the differences between faculties and fields of study would require more representative data than this study currently possesses.

Conclusion

The main aim of the study was to analyse the reception of the new quality assurance systems among the personnel in Finnish higher education institutions and to discuss their methodological challenges. The study indicates that cluster analysis makes it possible to classify personnel so that the division includes both types of higher education institutions in Finland. Cluster analysis also provides information on the respondents' individual work contexts.

With regard to the respondents' actual attitudes, the study shows that there are essential differences between research universities and polytechnics. Although this may partly be explained by the differences in personnel structures and a greater proportion of female respondents (who tended to be more positive towards quality assurance), this does not explain all of the variation, because the differences were even visible when compared cluster-by-cluster or by gender.

In almost all clusters and in all the topics that were measured, the personnel at research universities were more critical of the new modes of quality assurance, see also Cardoso *et al.* (2012). At research universities, the academically-oriented young researchers were the most critical of quality assurance or they refrained from expressing their opinion. This cluster was practically non-existent in the polytechnics, which further accentuates the difference between the two types of higher education institutions.

The people in managerial positions at the polytechnics were the most committed group among the clusters: whereas at the research universities, the differences between management and other groups (except young researchers) were less. The difference between research universities and polytechnics may partly be explained by the fact that quality work and various audits started to be implemented in polytechnics several years earlier than they were in research universities (Ala-Vähälä & Saarinen, 2013). The results indicate that the management of the polytechnics rely on the potential advantages that implementing the systems of quality assurance may provide them, whereas people in managerial positions at research universities are (still) adapting to the requirement.

Young researchers at research universities have loose ties with the university organisation, which may explain their unfamiliarity with, and weak commitment to, quality work, and may also explain their critical attitude toward quality assurance and their tendency to refrain from giving an opinion. The position of researchers without doctoral degrees may be different in other countries, where they may not be considered personnel, but doctoral students instead. However, this kind of personnel, working in temporary positions and with an unclear academic status, appears to be growing in number (Hakala, 2009; De Weert, 2001).

The assessments of expertise and commitment to quality assurance revealed slightly different patterns than the assessment of general attitudes. The differences between these clusters were greater and, not surprisingly, the people who participated in university management or were otherwise involved in institutional administration and development also had the most experience in quality work. However, their level of familiarity or expertise may not explain the differences between their attitudes, because even in clusters where respondents had about the same levels of familiarity and expertise, their levels of acceptance were different. Moreover, some clusters had the same levels of acceptance but gave different scores when asked to assess their familiarity with, and expertise in, quality assurance.

The results also indicate that the surveys do not only reveal the respondents' personal experiences with quality assurance but also reflect their shared opinions or shared ways of speaking about quality assurance. In addition, two kinds of biases should be kept in mind in this regard. First, the nature of the question has an impact on a respondent's willingness to give a response: statements that required personal experience elicited lower response rates than general-level statements. Second, people with strong opinions may be more eager to give an answer than those with more moderate attitudes, and this may cause a risk of bias. Therefore, the opinions do not only vary between two alternatives, for or against, but also vary according to a respondent's willingness to take an active stand on the topic or refrain from giving an opinion entirely. This is especially true in the case of young researchers who are 'outsiders' or 'alienated' from the quality assurance process and who may also be alienated from the university institution in general, as the cluster analysis indicated.

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Appendix: List of the survey statements assessed by the respondents

- 1. In my opinion, my university or polytechnic needs a good quality assurance system in order to function properly.
- 2. In my opinion, I am quite familiar with the quality assurance system of my university or polytechnic.
- 3. In my previous jobs, I became familiar with various quality assurance systems (e.g. ISO 9000, TQM, EFQM, CAF).
- 4. I participate actively in the maintenance of our quality assurance system by updating its contents or by contributing in some other way to its maintenance.
- 5. In my opinion, the quality assurance system of my university or polytechnic supports my work well.
- 6. I regularly use one or more elements of our quality assurance system, like the process handbook, student feedback system, and/or other systems of control or feedback.
- 7. I have contributed actively to the establishment or development of the quality assurance system of my university or polytechnic.
- 8. In my opinion, the quality assurance system of my university or polytechnic was established primarily to support the activities at the level of units of teaching.
- 9. In my opinion, the quality assurance system of my university or polytechnic was established primarily to support research or development projects.
- 10. In my opinion, the quality assurance system of my university or polytechnic was established primarily to support mid-level administration, such as the work done in faculties or institutions.
- 11. In my opinion, the quality assurance system of my university or polytechnic was established to support the work done in the departments (offices) of student services, financial administration or other similar support, service or administrative units.
- 12. In my opinion, the quality assurance system of my university or polytechnic was established in order to support the work done by the top management of my university or polytechnic.
- 13. In my opinion, the quality assurance system of my university was established primarily because the Ministry of Education, or a similar institution, requires it.
- 14. In my opinion, a quality assurance system increases the transparency of decision making at the level of the units of education.
- 15. In my opinion, a quality assurance system increases the transparency of decision making at the faculty level, in educational institutions or similar "mid-level" bodies of teaching administration.
- 16. In my opinion, a quality assurance system increases transparency in the offices of student services, financial administration or other similar support, service or administrative units.
- 17. In my opinion, a quality assurance system increases the transparency of decision making at the top management level of my university or polytechnic.
- 18. A quality assurance system makes it easier to search for information about my university or polytechnic.

- 19. The data collected by various systems does not give an accurate picture of my work.
- 20. Over the past few years, it has become easier to address practical matters or my work.
- 21. A quality assurance system makes it more difficult to address practical matters.
- 22. In my opinion, it is good that with the help of our quality assurance system we can unify our work methods in my university or polytechnic.
- 23. Due to the quality assurance system, it is easier to understand administrative processes.
- 24. In my opinion, due to the quality assurance system it is now easier take care of things in due time.
- 25. In my opinion, the implementation of the quality assurance system has decreased the level of independence of my own unit.
- 26. The management of my unit has strongly committed to the use of the quality assurance system.
- 27. In my opinion, the quality assurance system and my actual way of working are totally disconnected.
- 28. Audits and external assessments give an accurate picture of the quality of the activities of my university or polytechnic.
- 29. Audits and external evaluations take too much time in comparison to the benefits that they deliver.
- 30. If you wish to briefly comment on the quality of work done in your university or polytechnic, you may do so here.
- 31. In my opinion, my university or polytechnic gave me sufficient information about the audit before it was carried out.
- 32. I followed the process of the audit with great interest.
- 33. The audit criteria stated by the Finnish Higher Education Evaluation Committee had a strong impact on the university's or polytechnic's preparation for the audit.
- 34. Other universities or polytechnics experiences with audits had a strong impact on the on the university's or polytechnic's preparation process for the audit.
- 35. I was interviewed or participated an interview panel during the audit (yes/no).
- 36. The quality assurance system of my university or polytechnic was presented to the audit group truthfully, including its strengths and weaknesses.
- 37. In my opinion, the audit was used as an excuse to implement reforms that would not have succeeded otherwise.
- 38. During the preparation phase for the audit, many topics that required development were found.
- 39. The preparation for the audit was a good learning experience.
- 40. During the preparation process for the audit, my university or polytechnic was discussed in a way that was difficult for me to understand, at least in the beginning.

- 41. The quality assurance system of my university or polytechnic was built primarily in order to pass the audit.
- 42. Without the audit's deadline, the building of a quality assurance system would have proceeded much more slowly.
- 43. The preparation for the audit happened in a good atmosphere.
- 44. In my opinion, the development work of our quality assurance system stopped after the audit.
- 45. In my opinion, a positive audit result increases the credibility of my university or polytechnic on the international stage.
- 46. A negative audit result deteriorates the reputation of my university or polytechnic.
- 47. If the audit assessment were not positive, even after the re-audit, it would weaken the position of my university or polytechnic in its negotiations with the Ministry of Education over resources and result targets.
- 48. If you have other comments about the audits carried out by the Finnish Higher Education Evaluation Council, you can write your comments here.
- 49. I carry out research full-time or part-time along with other activities.
- 50. I participate regularly in the research or development work that is undertaken together with private business or public administration.
- 51. I participate actively in the activities of a scientific society.
- 52. I participate actively in various working groups, teams, networks or decision forums that have an impact on the activities of my university or polytechnic.
- 53. I like my current work.
- 54. In my opinion, the general atmosphere of my work unit is very good.
- 55. I feel that various changes and reforms progressively take time away from my real work.
- 56. I meet regularly with people with similar expertise at national or international forums.
- 57. I keep in contact with decision makers (politicians or public officials) at the local or national level.
- 58. I keep in regular contact with private companies, public sector units or representatives of business federations.

Tables:

Table 1. Response rate: research universities

Personnel group	Responses	Response rate
Professors	52	15,8%
Associate professors	18	11.8%
Teaching assistants	14	8.9%
University lecturers	80	22.8%
Other university teachers	34	16.3%
Researchers, including doctoral students having a paid research post in	132	11.6%
doctoral schools		
Other personnel	169	4.9%
Unknown	12	
Total	511	8.9%

Table 2. Response rate: polytechnics

Personnel group	Respondents	Response rate
Principal lecturers	35	9.0%
Lecturers	126	32.3%
Other teachers	52	13.3%
Other personnel	165	19.5%
Unknown	12	
Total	390	21.3%

Table 3. Information about the clusters

				Clust	er				Total
	1. Academics/ research	2. Academics/ R&D	3. Academics/ teaching	4. Managerial position	5. Young researchers	6. Adm. & support services	7. Adm./ networked	8. Young researchers/ R&D	
Research (1)	4.36 (1.21)	3.61 (1.34)	2.39 (1.59)	2.31 (1.59)	4.94 (0.37)	1.20 (0.67)	1.52 (1.11)	4.53 (0.77)	3.01 (0.06)
Research and development (2)	3.15 (1.49)	4.16 (1.02)	1.73 (1.13)	2.80 (1.69)	1.43 (0.61)	1.35 (0.85)	1.58 (0.96)	4.44 (0.73)	2.48 (1.58)
Commitment to institution (3)	4.05 (1.26)	4.08 (1.09)	3.03 (1.52)	4.51 (1.01)	2.04 (1.32)	2.48 (1.53)	4.31 (0.64)	3.53 (1.20)	3.51 (1.51)
Networking with colleagues (4)	4.52 (0.79)	3.68 (1.31)	3.46 (1.30)	4.34 (0.93)	4.29 (1.00)	1.75 (1.06)	4.27 (0.62)	4.02 (1.01)	3.74 (1.37)
Contacts with employers (5)	3.02 (1.51)	4.28 (0.88)	2.77 (1.53)	3.37 (1.48)	1.36 (0.72)	1.97 (1.36)	2.67 (1.46)	3.81 (1.00)	2.88 (1.56)
Age (average) in years (6)	49	48	48	51	34	46	42	33	46
Doctoral degree % (7)	100%	3%	3%	27%	36%	2%	-	-	27%
Managerial position % (8)	-	-	-	100%	-	-	-	-	15%
Participates in teaching (9)	71%	69%	100%	-	-	-	9%	-	42%
Permanent full- time job (10)	55%	76%	77%	86%	8%	65%	73%	-	62%
Share of male respondents	54%	43%	34%	41%	49%	27%	28%	47%	40%

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	N	163	102	173	122	80	119	64	43	866

Note: The numbers in the first column refer to the cluster criteria presented above. The first six rows show the averages and standard deviations of the Likert scale responses, in which 1= totally disagree and 5 = totally agree. Averages below 2 are highlighted in light grey; values above 4 are highlighted in dark grey.

Table 4. Main motivation for creating the quality assurance systems – internal motives or external pressures? (1 = strong internal motivation ... 5 = strong external pressure)

Cluster	Research universities			Polytechn	Statistical		
	Average	St deviation	n	Average	St deviation	n	significance ⁱ
1. Academics/research	3.8	0.85	86	3.7	0.77	14	0.593
2. Academics/R&D	3.6	1.01	14	3.4	1.14	48	0.536
3. Academics/teaching	3.9	0.98	28	3.2	1.12	78	0.003 ***
4. Managerial position	3.5	1.03	50	2.6	1.2	55	0.000 ***
5. Young researchers	3.8	0.63	13	(2.0)		1	
6. Adm. & support services	4.0	0.99	33	3.5	0.92	31	0.21
7. Adm./networked	3.7	0.79	13	2.9	1.20	23	0.14
8. Young researchers/R&D	4.4	0.60	7	2.8	0.73	9	0.000 ***
Total	3.8	0.9	244	3.1	1.1	259	0.000 ***

Table 5. General attitude towards quality assurance: research universities and universities of applied sciences (1 = critical attitude ... 5 = positive attitude.)

Cluster	Research universities			Polytechn	Statistical		
	Average	St deviation	n	Average	St deviation	n	significance
1. Academics/research	2.9	0.80	122	3.4	0.76	20	0.011*
2. Academics/R&D	3.3	0.79	23	3.4	0.89	71	0.389
3. Academics/teaching	2.9	0.90	50	3.4	0.92	106	0.007**
4. Managerial position	3.3	0.99	61	4.1	0.70	57	0.000***
5. Young researchers	2.6	0.75	45	(3.5)		(1)	
6. Adm. & support services	3.1	0.91	44	3.5	0.61	44	0.013*
7. Adm./networked	3.3	0.83	18	3.8	0.81	34	0.038*
8. Young researchers/R&D	2.7	0.84	15	3.5	0.60	17	0.004**
Total	2.9	0.88	389	3.5	0.84	350	0.000***

Table 6. Expertise and commitment to quality assurance: research universities and universities of applied sciences (1 = poor expertise and commitment ... 5 = excellent expertise and commitment)

Cluster	Research universities			Polytechni	Statistical		
	Average	St deviation	n	Average	St deviation	n	significance
1. Academics/research	2.9	1.08	139	3.4	0.86	21	0.012*
2. Academics/R&D	3.0	1.03	27	3.3	1.06	72	0.213
3. Academics/teaching	2.5	0.97	59	3.3	1.00	110	0.000***
4. Managerial position	3.7	1.01	62	4.4	0.67	58	0.000***
5. Young researchers	1.7	0.83	73	(3.7)		(1)	
6. Adm. & support services	2.5	1.15	63	2.9	1.13	50	0.048*

7. Adm./networked	2.9	1.04	25	3.5	1.17	38	0.054
8. Young researchers/R&D	2.0	1.06	22	2.7	1.01	19	0.040*
Total	2.7	1.17	470	3.4	1.09	369	0.000***

Table 7. The impact of gender on attitudes and commitment to quality assurance

		Research (Research universities				Polytechnics			
		Average	St dev.	n	Sig.*	Average	St deviation	n	Sig.	
Internal vs.	Women	3.7	0.92	143	0.008	3.0	1.1	172	0.00	
external motivation	Men	4.0	0.86	107	0.008	3.5	1.1	97	***	
General attitude	Women	3.1	0.80	225	0.000	3.7	0.76	230	0.000	
	Men	2.8	0.95	178		3.3	0.91	133	***	
Familiarity and	Women	2.8	1.2	271	0.023	3.6	1.08	247	0.000	
commitment	Men	2.5	1.1	217		3.1	1.05	136	***	

^{*}Pairwise t-test between men and women.

ⁱ Column "statistical significance" indicates the statistical significance between research universities and universities in each cluster unless otherwise stated.