

The background features a series of vertical wavy lines on the left side, transitioning from black to white to a light beige. On the right side, there are several overlapping circles and shapes in teal, pink, and dark blue. One circle has a diagonal striped pattern in teal and beige. The overall design is modern and abstract.

Trends in quality audits

INSTITUTIONAL EVALUATION FRAMEWORKS:
DESIGN AND REVIEW PROCESSES AMONG
THE AGENCIES OF THE
QUALITY AUDIT NETWORK

2023

Quality Audit Network

TRENDS IN QUALITY AUDITS 2023: Institutional evaluation frameworks, design and review processes among the agencies of the Quality Audit Network

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Abbreviations

- AAQ** – Swiss agency of accreditation and quality assurance (Switzerland)
- AI** – Danish Accreditation Institution (Denmark)
- ANECA** – National Agency for Quality Assessment and Accreditation of Spain (Spain)
- AQ Austria** – Agency for Quality Assurance and Accreditation Austria (Austria)
- AQU Catalunya** – Catalan University Quality Assurance Agency (Spain)
- ARACIS** – Romanian Agency for Quality Assurance in Higher Education (Romania)
- EHEA** – European Higher Education Area
- ENAE** – European Network for Accreditation of Engineering Education
- ENQA** – European Association for Quality Assurance in Higher Education
- EQA** – External Quality Assurance
- EQAR** – European Quality Assurance Register for Higher Education
- ESG** – Standards and Guidelines for Quality Assurance in the European Higher Education Area
- ESQA** – Effective involvement of stakeholders in external quality assurance activities
- EUA** – European University Association
- EUR-ACE** – European Accredited Engineer
- FINEEC** – Finnish Evaluation Education Centre (Finland)
- GAC** – German Accreditation Council (Germany)
- Hcéres** – High Council for the Evaluation of Research and Higher Education (France)
- HEI** – Higher education institution
- NOKUT** – Norwegian Agency for Quality Assurance in Education (Norway)
- NVAO Flanders** – Accreditation Organisation of the Netherlands and Flanders (Belgium)
- NVAO Netherlands** – Accreditation Organisation of the Netherlands and Flanders (Netherlands)
- QA** – Quality assurance
- QA-FIT** – Quality Assurance Fit for the Future
- QAA Scotland** – Quality Assurance Agency Scotland (United Kingdom)
- QAN** – Quality Audit Network
- QEF** – Quality Board for Icelandic Higher Education (Iceland)
- QQI** – Quality and Qualifications Ireland (Ireland)
- UKÄ** – Swedish Higher Education Authority

Foreword

In 2008, several quality assurance agencies from across Europe gathered in Vienna to share their experiences with quality audits¹. This meeting resulted in the establishment of the Quality Audit Network (QAN), an informal group that encourages and promotes the sharing and exchange of experiences between quality agencies. Since then, the QAN have held annual meetings to discuss objectives, methodologies and the implementation of audits, to report on new developments and to debate specific issues related to agencies' procedures. Throughout the years, the focus, scope, and methodological approach of quality audits have changed. The meaning of the term audit has evolved, and it is used differently. An important focus of the QAN has been the regular analysis and publication of information regarding developments and trends in audit approaches across Europe.

This study report is the fourth publication of the QAN to analyse trends in audit approaches. The first publication (Austrian Agency for Quality Assurance, 2009) provided insights into various countries' systems and developments. The second publication published (AQ Austria, 2014) gave an overview of the then most recent and future challenges related to specific aspects in external quality assurance. The publication compared audit procedures from twelve different agencies. The third publication (Kastelliz & Lynch, 2018), focused on changes in audit procedures that had taken place in agencies and changes anticipated for the future. The study also identified the reasons and circumstances for these changes. This present publication continues the QAN series of publications and focuses on institutional evaluation frameworks.

Today, the QAN remains a valuable and useful platform for agencies, particularly for agency staff conducting institutional external quality assurance procedures at higher education institutions. The QAN is a network for exchanging ideas and experiences and learning from one another. Some of the "founding members" of the still informal network have completed two or more cycles of audits in their respective national higher education systems. Several new agencies have joined the QAN in recent years and have since contributed to the network with their rich experiences of institutional external quality assurance. "Broadening the scope" is therefore not only a finding identified in the current study but is also a true objective for the network itself.

It is the aim of the QAN to understand different approaches to external quality assurance, to identify examples of good practices, and to use the exchange of experiences to further develop and enhance our agencies' procedures. We look forward to further fruitful meetings and learning experiences!

Dietlinde KASTELLIZ
AQ Austria

¹ External quality assurance procedures focusing on higher education institution's quality management system.

Introduction

This edition of the QAN “Trends in Quality Audits” will specifically focus on institutional evaluation frameworks. Evaluation frameworks are key documents steering the external evaluation process, defining the scope of the evaluation, its objectives, standards and/or criteria, methodology and outcomes. This document also ensures that agencies operate in accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015). Based on the ESG, external quality assurance should be based on a common framework, applied in a consistent and transparent manner, that ensures accountability and fair treatment of the higher education institutions being evaluated. As set out in the ESG 2.5, Criteria for Outcomes: “Any outcomes or judgements made as the result of external quality assurance should be based on explicit and published criteria that are applied consistently, irrespective of whether the process leads to a formal decision.” (ESG, 2015).

The purpose of this QAN study is to gain insight into the institutional evaluation frameworks of the QAN agencies, to identify commonalities and differences, as well as draw inspiration from different countries that can inform our own practice.

The aim of the study is twofold:

- to increase the understanding of the different types of institutional evaluation frameworks in the European Higher Education Area (EHEA).
- to gather best practice on design methodology for the improvement of evaluation frameworks and the involvement of stakeholders in this process.

Although evaluation procedures and methods are commonly included in the “evaluation framework”, these are not included in this study. This study focuses on the purpose, objectives, scope, standards and criteria, layout and writing style, design and any revision of institutional evaluation frameworks.

This report presents and discusses the results of the QAN 2023 study and highlights commonalities and differences in institutional evaluation frameworks using concrete examples. Part I discusses the format and content of evaluation frameworks used by the QAN agencies and how the QA approach, scope and target audience influences the layout and the writing style of evaluation frameworks. Part II presents and discusses agencies' practices pertaining to how they review their frameworks and the involvement of stakeholders in this process, including some of the challenges they face.

Although the QAN 2023 study represents agencies from across Europe, it does not claim to be representative of the EHEA. For example, agencies in Northern Europe were more represented in this study than agencies from other European regions. The authors also recognise that variations exist with institutional approaches and evaluation frameworks of agencies which relate both to the distribution of roles and tasks in terms of quality assurance and to other possible external quality assurance procedures of the agency. Therefore, the aim of the QAN 2023 study is not to provide a comprehensive and representative analysis, but rather to sketch the landscape of 16 agencies and illustrate their practices.

Methodology

This QAN study was conducted using a variety of approaches and was carried out following a 4-phase methodology.

Phase 1 – QAN annual seminar (June 2023)

Hosted by Hcéres in Paris in June 2023, the 2023 QAN seminar on institutional evaluation frameworks marked the beginning of the study. The seminar was a unique opportunity to delve into the under-researched topic of designing and revising institutional evaluation frameworks. This was done through interactive workshops and peer learning activities. During the seminar, some semantic issues emerged in relation to the concept of institutional evaluation frameworks. As is often the case in external quality assurance, agencies use different concepts to describe their activities, or the same concepts may be used but have different meanings depending on the national context. The following definitions of “evaluation framework” and “standards/criteria” were used in this study:

- Evaluation framework refers to the document that provides a comprehensive overview of the processes, methods and standards with which an entity is audited/reviewed/evaluated. It may be expressed in terms of domains, standards, criteria and/or guidelines that will define the scope of the audit/review/evaluation. Although most agencies describe their external quality assurance procedures and the standards in the same document, only the standards will be addressed in the study.
- Standards/criteria are defined as quantitative or qualitative principles or measures that guide the audit/review/evaluation of an entity.

A task force consisting of five members from the Austrian, Danish, Finnish, and French agencies was established to manage the study project and to analyse the testimonies gathered during the seminar and the responses to a follow-up questionnaire. Hcéres was the coordinating agency for the project.

Phase 2 – Questionnaire (July – Sept. 2023)

The second phase of this QAN study focused on collecting data through a questionnaire sent to all QAN agencies. The authors expected one response per agency, rather than per country, to better account for the diversity of practice in countries or regions with several agencies (Belgium, Spain, United Kingdom). The questionnaire consisted of a combination of open, closed and multiple-choice questions. 16 QAN agencies answered the questionnaire. When referring to the “QAN agencies” in this study, we mean the 16 agencies that responded.

Most agencies (10/16) responded to the questionnaire in a collaborative way, involving several people in their agency.

Phase 3 – Data analysis and writing of the study (Oct. 2023 – Feb. 2024)

The task force held several meetings to agree on the analysis of the data questionnaire and the writing of the report. Agencies were contacted by email when more information was needed to clarify questionnaire responses. The analysis also drew on scientific and grey literature, the input of which is directly incorporated into the study to put it in the context of existing research on related issues.

Phase 4 – Peer review and fact-checking by all QAN agencies (Apr. 2024)

Once complete, the study was circulated to questionnaire respondents for fact-checking. The work of the coordinators of the QAN study was also peer-reviewed by the other authors and language edited by the Irish agency (QQI). Their input was used to improve the final version of the publication.

The 16 agencies listed in Table 1 replied to the questionnaire prepared and sent out by the task force.

Table 1: Responding Agencies

AAQ – Swiss agency of accreditation and quality assurance (Switzerland)	Hcéres – High Council for the Evaluation of Research and Higher Education (France)
AI – Danish Accreditation Institution (Denmark)	NOKUT – Norwegian Agency for Quality Assurance in Education (Norway)
ANECA – National Agency for Quality Assessment and Accreditation of Spain (Spain)	NVAO Flanders – Accreditation Organisation of the Netherlands and Flanders (Belgium)
AQ Austria – Agency for Quality Assurance and Accreditation Austria (Austria)	NVAO Netherlands – Accreditation Organisation of the Netherlands and Flanders (Netherlands)
AQU Catalunya – Catalan University Quality Assurance Agency (Spain)	QAA Scotland – Quality Assurance Agency Scotland (United Kingdom)
ARACIS – Romanian Agency for Quality Assurance in Higher Education (Romania)	QEF – Quality Board for Icelandic Higher Education (Iceland)
FINEEC – Finnish Evaluation Education Centre (Finland)	QQI – Quality and Qualifications Ireland (Ireland)
GAC – German Accreditation Council (Germany)	UKÄ – Swedish Higher Education Authority (Sweden)

Evaluation frameworks and procedures compared in this study referred to distinct types of external quality assurance procedures at institutional level. These are identified below.

- Accreditation/assessment with a focus on the quality of activities and services in institutions.
- Quality audits with a focus on the quality management systems and/or the overall functioning of HEIs.

60% of QAN agencies are focused on quality audits of the internal quality management system (10/16), while the remaining agencies focused on institutional-level accreditation/assessment that considers the overall functioning of HEIs (including internal QA).

These two main types of procedures have different objectives and outcomes:

- accreditation (30%),
- certification (25%),
- quality review (45%).

For 70% of the QAN agencies, the outcome and follow up to audit/assessment procedures are directly linked to legislative or financial consequences. The most common legal consequence of the institutional procedures concerns educational provision/programmes, such as the institution's authority to self-accredit, its authority to develop and validate new programmes, or its obligation to demonstrate EQA procedures at a programme-level. In the case of AAQ, the outcome also impacts on the institution's right to use the name "university".

There are also differences amongst the QAN agencies in relation to the length of their evaluation cycles. These vary from 5 (Hcéres, QAA) to 8 years (NOKUT). The average cycle is 6.2 years.

The average number of institutional review/audit procedures performed by each QAN agency per year varies quite extensively from one country to another. For example, from 1 in Iceland to more than 50 in France. The main factor impacting the number of procedures completed is the size of its higher education system, followed by the individual agency's mandate (national or regional).

Part I - Designing Institutional Evaluation Frameworks - what Purpose, Format and Scope?

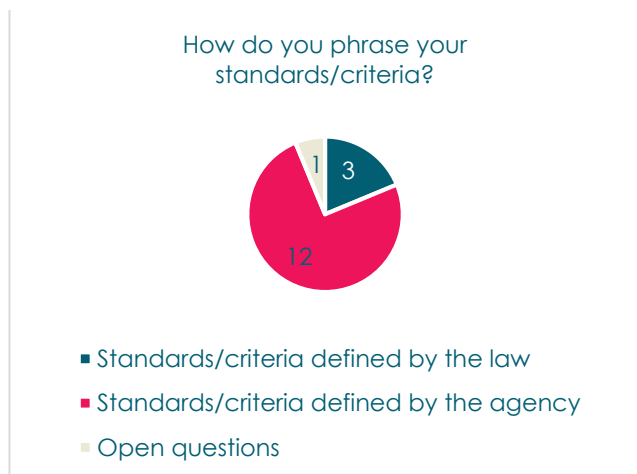
Part I presents and discusses the institutional evaluation frameworks of the QAN agencies. The focus, format and content of the evaluation frameworks are examined. How the EQA approach, scope and target audience influence the layout and the writing style of the evaluation frameworks is also addressed.

The next three sections will discuss the structure and focus of the evaluation frameworks, including different methods agencies use to make frameworks more flexible or challenging.

A diversity of structures

Agencies carry out their external quality assurance processes according to national legislation that, in some cases, identifies its standards and criteria. This can inform an agency's evaluation framework design and limit the agency's development of new criteria. Legal directions can be included in a framework that also includes the agency's guidelines and requirements (ie AQ Austria, AI). Other agencies document these separately (ie. AAQ, QAA). As shown in Figure 1, most QAN agencies stated their ability to define their own standards and criteria based on evaluation areas or general principles defined by national legislation (exceptions are NOKUT, GAC and AAQ).

Figure 1: Origins of standards and criteria



Regardless of whether standards and criteria are derived directly from national legislation, the key guiding document for QAN agencies, and any other quality assurance agencies operating in Europe, are the European Standards and Guidelines for Quality Assurance in the EHEA (ESG, 2015). Quality assurance agencies adhere to the ESG to be considered a member of the European Network for Quality Assurance in Higher Education (ENQA) and be included in the European Quality Assurance Register for Higher Education (EQAR). One of the key purposes of the ESG is to set a common framework for quality assurance systems for learning and teaching in the EHEA. However, one single approach to quality assurance is not appropriate due to the diversity of political systems, higher education systems, socio-cultural and educational traditions, languages etc. (ESG, 2015.) Nevertheless, as agencies seek to align with the ESG, some commonalities in institutional evaluation frameworks across the EHEA and the QAN agencies are likely.

In terms of standards, QEF and AEQES are the only examples among QAN agencies that have not developed their own criteria and directly use the ESG. Interestingly, QEF also provides a local interpretation of the ESG to contextualise the standards in the Icelandic higher education context.

Table 2: Icelandic Quality Council for Higher Education (QEF) using the ESG as a model for designing its evaluation framework.

Component	Example from the framework
Explicit title	ESG Standard 1.3: Student-Centred Learning, Teaching and Assessment
Standard directly taken from the ESG	<i>Institutions should ensure that the programmes are delivered in a way that encourages students to take an active role in creating the learning process, and that the assessment of students reflects this approach.</i>
Guidelines directly taken from the ESG	<i>The implementation of student-centred learning and teaching -- respects and attends to the diversity of students and their needs, enabling flexible learning paths;</i>
Icelandic commentary for applying the standard provided by the QEF and designed to contextualise each standard for Icelandic institutions.	<i>This standard also applies to institutions' active engagement of students as decision-makers and cocreators in teaching, learning and assessment, as well as engaging students in the development and implementation of quality processes around these activities.</i>
Frame of Reference provided by the QEF in order to clarify and exemplify specific aspects of the standard and guidelines for the Icelandic institutions.	<i>The learning outcomes approach is sensitive to the diversity of the student body in terms of physical or mental health status, gender, sexual orientation, skin colour, nationality, religion, residence or financial situation</i>

Although the layout of the ESG (2015) does not constitute a single model to design evaluation frameworks, we can still identify three main components from its structure (ESG, 2015). See below:

1. Section title.
2. "Standards are agreed and accepted practice for quality assurance in higher education".
3. "Guidelines explain why the standard is important and describe how standards might be implemented. They set out good practices in the relevant area for consideration by the actors involved in quality assurance. Implementation will vary depending on different contexts" (ESG, 2015, p9).

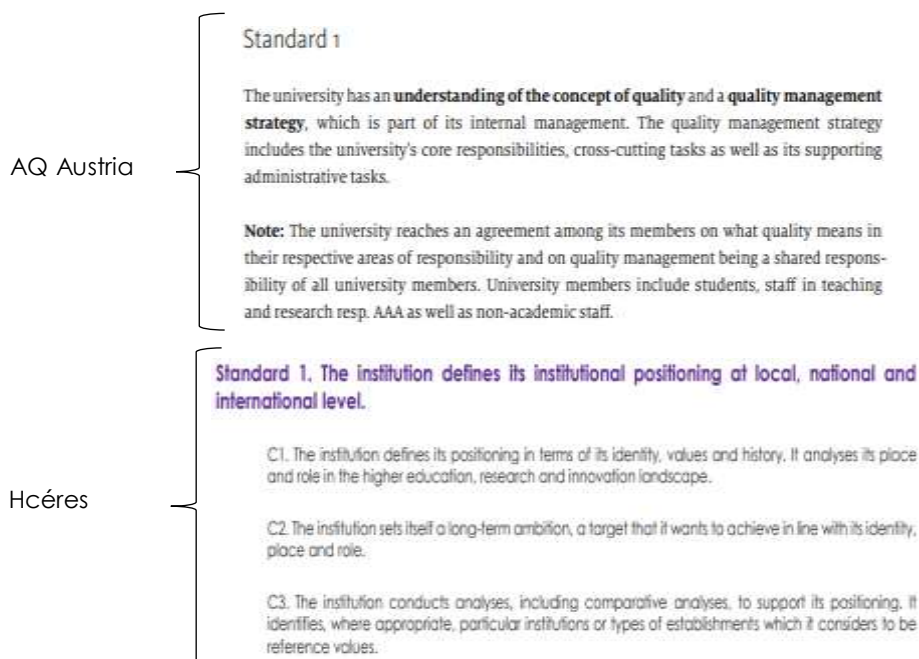
All evaluation frameworks analysed in this study contain at least components 2 and 3. Although the above definitions are taken from the ESG, a variety of terminology is used from one agency to another. An examination of how the three components are used by the QAN agencies, highlights the main differences between agencies.

Component 1 refers to the overarching themes or domains that define the scope of the evaluation and structure the evaluation framework. These can be section titles and are referred to as *Dimensions* (AQU), *domains* (Hcéres), *assessment or evaluation areas* (UKÄ, FINEEC) and *areas* (ARACIS). Agencies use these terms to group several standards within a main theme. This formal point is important because it helps to identify the agency's evaluation priorities. Hcéres' evaluation framework used to have six domains (institutional positioning and strategy; institutional governance; education and research policy; student success; scientific promotion and culture, European and international policies). In 2022, the framework was reduced to three domains (strategic management; research policy; education policy). This change was politically significant for HEIs and external stakeholders, as it meant, for example, a stronger focus on the evaluation of research, which now represents a third of the framework (Box 11).

Component 2 consists of statements (defined by law or by the agency) regarding the expected level and conditions against which quality or quality assurance and enhancement is assessed or must be attained by an HEI undergoing an EQA procedure. These are generally referred to as “standards” (Hcéres, NVAO NL, AQ Austria), but a variety of equivalent terms are used. These include, *assessment or evaluation criteria* (UKÄ, AI, FINEEC) or *elements of evaluation* (ASHE). Standards and criteria are sometimes used synonymously, but an overview of several official and working documents reveals a hierarchy between both concepts: standards being the principles to which one should conform or by which one's quality is judged, while criteria are the quantitative or qualitative elements that make it possible to assess the level of implementation of a standard (adapted from IIEP-UNESCO, 2007). In other sources, such as in Harvey's definition (2004-2024), the two concepts are rather similar in meaning and include a specified or fixed element against which judgement or comparison can be made. In Harvey's definition, standards also specify a level of attainment. This point will be discussed in another section of this document.

The QAN study reveals that the most diverging approaches observed among the surveyed agencies were at the level of the criteria (component 3). Criteria can appear as a list of non-exhaustive guidelines written in short and explicit sentences (e.g., ANECA, Hcéres), or stated in a more literary manner (e.g., UKÄ, AQ Austria). The first style of writing criteria is exemplified in Hcéres evaluation framework, in which the criteria are expressed in numbered affirmative sentences. This structure can facilitate the work of HEIs and experts by pinpointing the topics to be analysed. However, as the criteria seem more statutory in appearance, this practice can lead to the undesirable effect of encouraging evaluated entities to “tick the boxes”. To address this in France, Hcéres recently introduced reflective questions in the templates of its self-evaluation report to encourage HEIs to go beyond the expressed criteria and adopt an analytical approach. Other agencies have chosen to express their guidelines in explanatory paragraphs. This second style of writing criteria is exemplified by AQ Austria's framework in which standards are expressed in a very broad manner. The criteria are followed by a *note* providing experts and HEIs with some guidance in understanding and implementation of the standards. The aim of this principle is not to break down the description and assessment of the quality management system to small-scale criteria, but to enable the experts to grasp the whole picture. Both approaches are illustrated below.

Figure 2. AQ Austria vs Hcéres: two distinct layouts



The organisation of an evaluation framework into standards and/or criteria refers to the scale or level of detail of external quality assurance procedures. Based on the analysis, very holistic and profound evaluation frameworks were identified, as exemplified by AI (3 domains, 34 standards), ARACIS (3 domains, 17 standards), AQU (8 domains, 26 standards), and Hcéres (3 domains, 17 standards, 53 criteria), while other frameworks are significantly shorter (4 standards for NVAO NL). The FINEEC framework is an

example of a holistic framework that includes few domains ("evaluation areas") while also covering a wide array of different topics.

Defining the number of standards and their level of precision is a key challenge for QA agencies. It emerged from the study that there is a slight trend toward the simplification of evaluation frameworks, with some agencies such as UKÄ and AI attempting to reduce the number of standards and criteria. NVAO Flanders has taken a step further by moving away from the standards/criteria model, as illustrated below. The number of standards is not an indicator of how "simple" a procedure is, but rather of the approach to external quality assurance. This is explained further in the next section.

Box 1. NVAO Flanders' approach to institutional evaluation without criteria

NVAO Flanders has taken a clear stance in favour of no longer prescribing criteria. The scope of the evaluation conducted in the light of the review is expressed in four questions:

- Is the educational policy in line with the educational vision of the institution and the societal challenges it is facing within its own context?
- Does the institution ensure the effectiveness of its educational policy; in other words, how does the institution work towards the set goals?
- Within this policy, is the quality of each accredited programme confirmed in an internationally accepted manner?
- Does the institution demonstrate a quality culture at all levels?

A recent article (Larsen, 2020) clearly explained NVAO's philosophy: "Based on the desire to make the process simple, NVAO has also decided to move away from all kinds of fixed criteria, formats and templates. Instead, the panel can focus on the areas that seem most relevant to them in the context of the institution under review.

Basically, quality assurance - and also the ESG (The Standards and Guidelines for Quality Assurance in the European Higher Education Area.) - is really about three questions: 'What do you intend?', 'How will you implement it?', and 'How can you make sure that what you intended is also achieved in the end, as you planned it?' The three questions are in fact guiding all processes, and what we would prefer is a holistic review by the panel in order to answer those questions.

In the past, panels often felt limited by standards and criteria. They might notice something interesting but were not able to include it in their discussions and final report because it was not part of the criteria. And there could also be criteria that the panel did not find particularly relevant for the institution, but which they nevertheless had to discuss in the report. Therefore, we do not use standards and set criteria anymore, (...) and also no fixed format for the critical self-reflection of each institution, just as there is no imposed structure for the review report."

In summary, evaluation frameworks used by the QAN agencies are surprisingly diverse in terms of format, length, content and style. The variety of concepts used can be a challenge when making comparisons between agencies. The reasons for the difference in terminology used was not addressed in this study. In many cases, terms relate to the language and culture of the agency. The ESG allow for a diversity of EQA approaches and does not prescribe a specific terminology or structure for evaluation frameworks. From an operational perspective of conducting external quality assurance procedures, the standards/criteria against which the judgement is made is more important than the actual concept used. What is essential in any evaluation is the value judgment. Evaluation is per definition about giving value (merit, worth, value, significance) to something or an activity (Scriven, 1991; Stern, 2004). As a systematic activity, evaluation involves the collection of data and making judgements against explicit or implicit criteria (Stern, 2004).

Prescriptive and open evaluation frameworks

A continuum can be drawn between “open” and “prescriptive” evaluation frameworks. This reflects the philosophy of external quality assurance procedures in each context. At one end of the continuum lie open frameworks in which the focus of EQA is on how the HEIs have achieved the aims and objectives that they have set by themselves. At the other end of the continuum are prescriptive frameworks in which EQA is about how HEIs conform with a pre-defined understanding of what constitutes quality and quality assurance at HEIs. The QAN agencies are situated along that continuum.

The way standards and criteria are written will determine the openness and prescriptiveness of the evaluation framework. In open frameworks, standards/criteria are formulated in a broad and generic way. They are usually expressed qualitatively, with no direct mention of quantified targets. Open frameworks are more contextualised, making EQA more responsive to HEIs' specificities. It is up to the HEI to demonstrate how it is performing in a particular area and to provide evidence to support this. However, by leaving more room for interpretation in the application of criteria, open frameworks are less transparent and criteria more implicit. In prescriptive frameworks, criteria are more explicit and transparent, and specify what is expected from the QA-practice of the HEIs. For instance, prescriptive frameworks may include sets of indicators or supporting evidence. They may even include quantitative targets defined by the agency.

The following two examples illustrate the two ends of the continuum, namely the open and prescriptive frameworks.

In AQ Austria “Audit Guidelines for Universities”, standard 1 states:

Standard 1

*The university has an **understanding of the concept of quality** and a **quality management strategy**, which is part of its internal management. The quality management strategy includes the university's core responsibilities, cross-cutting tasks as well as its supporting administrative tasks.*

Note: The university reaches an agreement among its members on what quality means in their respective areas of responsibility and on quality management being a shared responsibility of all university members. University members include students, staff in teaching and research resp. advancement and appreciation of the arts (AAA) as well as non-academic staff.

The quality management strategy aims at reaching the university's objectives and enhancing its quality. The university's core responsibilities comprise the performance areas studying and teaching as well as research or AAA. The cross-cutting tasks include internationalisation and societal objectives. The supporting tasks cover the fields of organisation, administration, and human resources.

This one standard does not include any prescriptive elements for HEIs. The HEI is free to define its own concept of quality. A short paragraph will indicate some elements for the interpretation of the criteria, specifically the perimeter in which the quality management strategy shall be applied (teaching and learning, research, internationalisation, third mission, organisation and human resources). It does not separate the main missions of the university from its support functions, nor does it separate academic and administrative staff. In this sense, this standard is ambitious and requires the university to reflect on its processes in a transversal way. In this extract, the purpose of the quality management system is closely linked with the achievement of institutional goals and contributes to its overall performance.

On the same topic, the below extract from ARACIS' “methodology” for external evaluation shows a very distinct approach.

*Criterion C.1 - Quality Assurance Strategies and Procedures**S. C. 1.1 Quality Assurance Structures and Policies*

Structures, policies, and strategies create the institutional framework for concretely developing and monitoring quality, for establishing a quality culture and for continuously increasing quality standards. Quality assurance policies reflect the relation between research, learning and teaching and consider the national context in which the institution conducts its activity as well as the institutional context and its strategic approach.

*Performance indicators**PI C. 1.1.1. Organization of the quality assurance system*

Min: The institution has a central commission and commissions on study programs which work together in an integrated manner.

Ref. 1: The university promotes actively, at all levels, a culture of quality in education, conducting activities for promoting the mutual respect in the student-teacher relations; the institution has adequate procedures for addressing student complaints. Students are involved in all quality assurance processes and structures, at all institutional levels.

Ref. 2: The commission develops activities to establish qualitative and quantitative benchmarks for evaluating and monitoring quality, by comparison with other universities from Romania and abroad.

PI C. 1.1.2 Quality assurance policies and strategies

Min: There is a policy program, focused on quality, which outlines the means of implementation. Policies and strategies in place in each compartment and stimulate the participation of every member of the teaching and research staff, and also the participation of students. The education institution submits a report on the manner of achievement of the provisions of the quality policies program.

Ref. 1: There are implementation strategies, with concrete provisions and deadlines, which correspond to each policy. The education provider/education institution drafts an annual review of the positive and negative aspects of the internal quality assurance - a SWOT analysis which is made public.

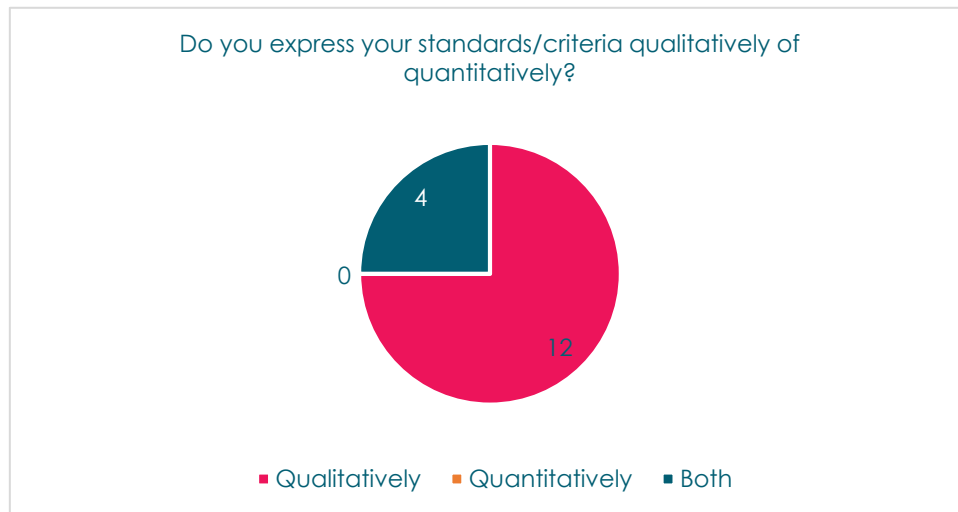
The ARACIS framework is very detailed. For each standard (called "criterion"), the agency has established several types of performance indicators ("min" for minimum acceptable level) and standards of reference ("ref"), which are the optimum level². Through the evaluation framework, the agency regulates the design of the internal quality assurance system. Here, for example, the organisation of the internal quality assurance system is described: central committee, with its role, composition and the form of its outputs. The criteria are formulated in a transparent way, so that the institution can measure itself against a pre-established norm. The institution is invited to report on the procedures to assess the quality of study programmes. In the above extract, the purpose of the internal quality assurance system is closely linked with the achievement of provisions of quality identified in the education policy.

These examples demonstrate that the way that standards and criteria are drafted is highly significant for QA agencies. Detailed formulations, identifying precise outcomes lead to a highly prescriptive approach which can meet the needs of certain contexts. However, a more flexible formulation of the standards allows more scope for HEIs to justify their choices in their own way. One example is the guidelines of AI

² ARACIS has declared that this system was no longer used since 2023.

that relate to measurable standards. The guidelines explain that the HEI must use clear, measurable standards that can be linked to process or outcome standards, qualitative or quantitative. In other words, AI guidelines clarify concepts but allows for variance among the HEIs. Based on the study, a highly prescriptive approach is not common among the QAN agencies. As shown in Figure 3, most of the QAN agencies express the standards and criteria in a qualitative way, while only four agencies use both qualitative and quantitative expressions. As such, there is a wide continuum between prescriptiveness and openness, with at least one reported case of strong resistance from HEIs to using any kind of indicators or prescribed evaluation themes. The reason being that these indicators are perceived by the HEI as compromises their autonomy and ability to respond independently to the societal challenges they face, in the context in which they operate (NVAO Flanders).

Figure 3: Qualitative or Quantitative Criteria?



Is there a direct link between the openness and prescriptiveness of the evaluation framework and the final purpose of the external quality assurance procedure? Around 70% of the responding agencies stated that its EQA procedure results have legal consequences: degree-awarding power, the right to develop and validate new programmes, the right for HEIs to accredit their own programmes etc. It may be tempting to hypothesise that for EQA procedures with legal implications, the evaluation frameworks tend to be more prescriptive, identifying specific elements that need to be validated. Examples from the QAN agencies show that there is no clear link to support this hypothesis. Most agencies pursue both compliance and enhancement-oriented procedures. NVAO Flanders, for example, has an open framework with four reflexive questions and the outcomes of the procedure are linked to the extension of programme accreditations for some cases. Also, it should not be supposed that procedures with legal consequences do not consider the continuous improvement of HEIs and are solely focused on compliance. The case of NVAO FL suggests that contexts in which there is a great deal of experience in EQA and a high degree of autonomy on the part of the HEIs may lead to a more overall analysis aimed at identifying areas for progress and offer support for improvement. Agencies represented in the QAN network mostly come from mature higher education systems. A key factor affecting the formulation of standards/criteria, which was often mentioned in the comment section of the questionnaire, is the degree of trust and respect that exists for the autonomy of the HEIs.

To conclude, the diversity of evaluation frameworks reflects the nuanced approach taken by QA agencies to find the right balance between "open" standards that enable HEIs to defend their own choices in a flexible manner, and detailed requirements for the experts to be able to make an objective and informed analysis. The way agency adapts the framework to these two audiences is discussed in the next section.

Different Audiences of the Evaluation Frameworks

An evaluation framework is aimed at a variety of national and international audiences. As an operational document of the institutional EQA procedure, its main target groups are the higher education institutions under review, the expert panels conducting the evaluation procedure, and the decision-making body in those agencies in which the EQA procedure involves a final judgement.

For the HEIs, the role of the framework is to guide internal stakeholders to prepare for the upcoming evaluation. In particular, the framework is the main document supporting the self-evaluation process, in many cases providing the plan for the self-evaluation report itself (although more flexibility can be observed, in line with the previous discussion on open and prescriptive frameworks). However it can also serve as a tool for the continuous improvement of HEIs. This is most effective when HEIs take ownership of it, widely engage different actors in the self-evaluation process and use it as a tool for self-reflection and improvement. In this respect, the design of an evaluation framework can be pivotal with respect to the impact of external quality assurance on internal quality assurance. This is corroborated in previous studies (see Martin, 2018).

For the expert panel, the evaluation framework describes the external quality assurance procedure and the standards and/or criteria against which the activities of the HEIs are judged. In the evaluation, the framework also functions as a tool for analysis and for preparing the questions for the site visit. The expert panels also need to take stock of the document to understand its purpose as well as the agency's approach to quality, quality assurance and EQA procedure.

Notable differences in tone were observed in the QAN study of the evaluation frameworks and in the efforts made by the agency to provide clarification and guidance. AI offers an interesting example of mixing statutory provisions (direct references to legislation from which the standards are taken) with inputs from the agency directed to both HEIs and expert panels.

Box 2: A Single framework for many stakeholders (Denmark)

For each standard (called "criterion"), AI provides expectations aimed at experts and guidelines aimed at HEIs. For example, in Criterion I on publicly available policy:

- Expectation: *"The institution has published a quality policy that generally describes how quality assurance supports the institution's goals for programme quality and relevance".*
- Guideline: *"A Publicly available quality policy means that the quality policy can be found on your website, for example".*

Expectations form the basis on which the panel assesses the ongoing quality assurance of HEIs. The ambition is also to make the expectations clear across different accreditation panels, the HEIs, AI and the Accreditation Council which decides on each institutional accreditation. In other words, the objective is to support consistency in the decisions on accreditation.

"Expectations" are more clearly referring to the quality cycle (plan, do check, act) compared to the executive order summarised in "standards". "Guidelines" clarify and explain key concepts and contexts in the text of the criterion and the expectations.

While some agencies remain focused on the description of standards and expectations for the HEIs, there are examples of agencies that use the framework for broader purposes, supporting HEIs to adopt a quality culture and helping them in the preparation phase of the self-evaluation report. This could be referred to as a "pedagogical" approach in an evaluation framework. These can include definitions (AI), explicit references to national and international guidelines and regulations, including non QA-related frameworks (e.g., SDG for AQU), discussions on the relevance of the standards compared to the ESG or a local interpretation of them (QEF). Here we can distinguish two practices: agencies with "self-sufficient" evaluation frameworks (standards and guidelines in the same document) while others have produced a set of complementary tools that will serve as guidance to support HEIs undertaking EQA process.

Box 3: "Extending" the Evaluation Framework in Ireland and Scotland

QQI for instance has developed a "tool kit" comprising policies, procedures and guidelines adapted to target a variety of HEIs (i.e., Review Policy, Review Terms of Reference, Handbook for reviews of public and private HEIs).

QAA Scotland has a similar approach. The regulatory framework as stated in the Quality Code³, sets out the Expectations and the Core and Common practices, complemented by a series of "Advice and Guidance". The Advice and Guidance is divided into 12 themes (i.e., Admissions, Research Degrees, Work-based learning etc.) and designed to support new and existing providers in meeting the mandatory requirements of the Quality Code. It has been developed in partnership with the higher education sector and includes guiding principles, practical advice and further resources. The Advice and Guidance is not mandatory for providers, but illustrative of a range of possible approaches. The structure of this "extended" model is presented below:



To conclude, a key question for agencies to address is how to balance the different kinds of information provided to HEIs in an evaluation framework. Indeed, providing as many guidelines and instructions as possible to assist interpretation of the standards is a commendable way to avoid misunderstandings and ensure consistency between procedures. This is especially useful with evaluation process with legal consequences (degree awarding power, accreditation etc.). However, this can reduce freedom of HEIs to create their own processes. The blurred line between "explanation" and "expectation" should be carefully managed by agencies to avoid setting "hidden" standards in the guidelines. On the other hand, open frameworks with very few criteria and guidelines are easily contextualised and can be applied in an enhancement-oriented manner. However, open frameworks with less explicit criteria may introduce new risks in the form of less transparent and subjective approaches, with review panels potentially making value judgments of the HEI's achievements and activities against their own criteria.

The three sections above have illustrated that evaluation frameworks are strongly rooted in the context in which they have been designed. This is reflected in the variance in structure and length of frameworks, and in the style in which standards and criteria are written. At the heart of this discussion is the autonomy and trust granted to HEIs in defining their own quality management system, as was already explained by Martin and Stella (2007, p101): "variations in the understanding of what constitutes institutional autonomy, for instance, lead to differing understandings of how an effective quality assurance system should operate".

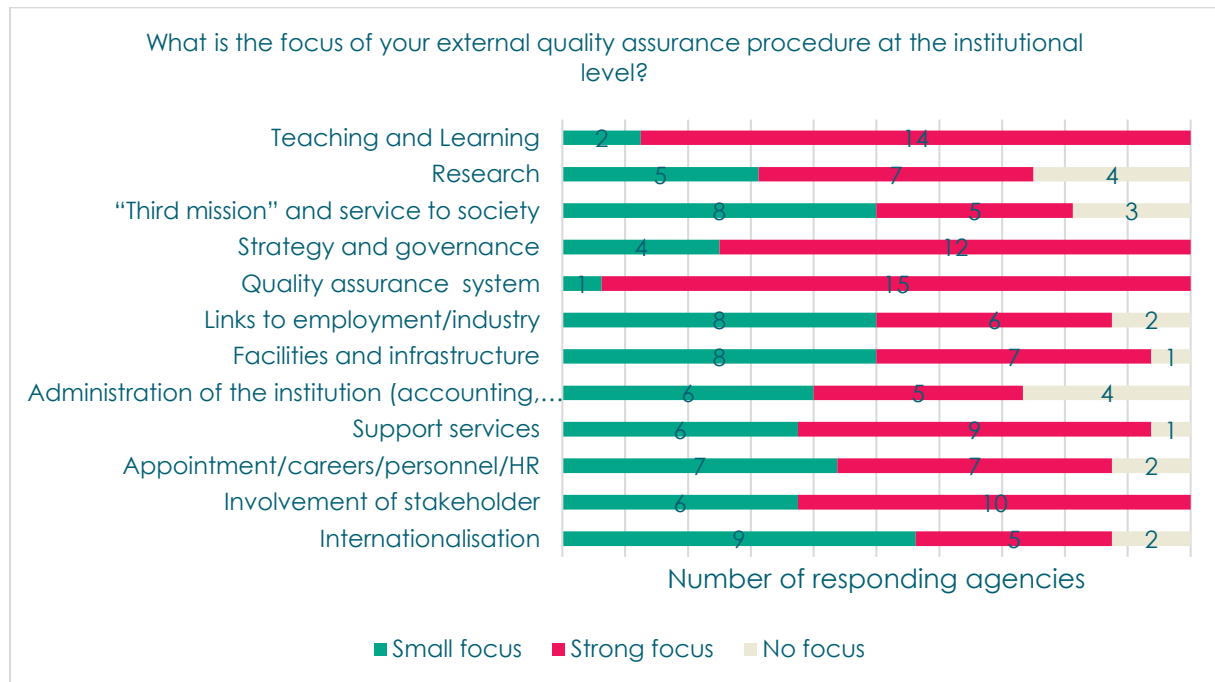
After addressing the issues with form of the framework, the next three sections will focus on the scope. To what extent do the evaluation frameworks have a holistic or specific focus? Are these foci the same for all HEIs or are different procedures applied for different types of HEIs? Are evaluation frameworks focused on minimum standards or excellence?

³ At the time this study was written, the Quality Code was being revised.

Focus of Institutional Reviews: going beyond teaching & learning

The areas covered by the external quality assurance procedures were recently the subject of a comprehensive study as part of the QA-FIT study coordinated by ENQA in 2023. Carried out on a smaller scale, the QAN survey broadly corroborates the QA-FIT results of the EUA study (EUA, 2023a) showing that agencies go beyond the focus of teaching and learning as they appear in the ESG (see Figure 4)

Figure 4: Focus of External Quality Assurance Procedures at the Institutional Level



The main focus of institutional-level external quality assurance procedures are:

- Teaching and learning
- Quality assurance system
- Strategy and governance

Additionally, some other areas are evaluated, but to a lesser extent, in institutional-level external quality assurance procedures:

- Facilities and infrastructure
- Links to employment and industry
- Appointment/career/personnel
- Involvement of stakeholders

Finally, areas that are not covered by all QAN agencies are:

- Research
- Administration of the institution (least focus on administration)
- Third mission
- Internationalisation

In terms of focus, there is a clear difference between institutional accreditation procedures and those certifying the internal quality management systems. Accreditation criteria tend to cover more areas because they address a broader range of a HEI's activities. While audits tend to address the effectiveness of a quality management system (e.g., AQ Austria, AQU). In the latter, the focus on administration, support functions and the link with industry is less prevalent. This does not mean that they are not assessed

at all, but that they might be covered by other co-existing external quality assurance procedures. In some countries (e.g., Finland, France, Romania), the audit is the only external quality assurance procedure at institutional level, and it adopts a more holistic approach. Strategy and governance are understood differently depending on the type of procedure (central governance or quality governance).

The relatively low focus on internationalisation may come as a surprise (9/16 agencies have a “small focus” on internationalisation, and 2/16 agencies, AI and UKÄ, do not tackle it), given its importance to universities and recent European University Alliances. Indeed, the EUA study (2023a) shows that 64% of HEIs’ internal quality management systems address institutional support for internationalisation to a large extent and 30% to some extent. Tools such as the Certificate for Quality in Internationalisation (CeQuint) and national labels have been developed to specifically assess this area, but their implementation does not explain the lack of focus on internationalisation in evaluation frameworks. However, internationalisation can be understood as relevant across a university’s functions, hence the absence of a targeted focus on a standard or domain, such as in Hcéres’ framework. This is summarised in the idea of a “comprehensive internationalisation” defined by Hudzik (2011) as “a commitment, confirmed through action, to infuse international and comparative perspectives throughout the teaching, research, and service missions of higher education. It shapes institutional ethos and values and touches the entire higher education enterprise”.

Finally, some agencies have highlighted distinctive focuses in their evaluation framework. These include, knowledge base at AI (see Box 4) and a strong focus on gender equality at UKÄ.

Box 4: Example of two specific focuses in the Danish and Swedish frameworks

An interesting standard developed by **AI** related to the “knowledge base”. In the text of the executive order, “knowledge base” is defined as follows: *the institution has a practice ensuring that education programmes and teaching are always based on a knowledge base corresponding to programmes of the given type and at the given academic level and providing a solid foundation for achieving the goals of the programmes.*

Quality assurance of a “Knowledge base” plays a major role in the Danish accreditation system, among other things, because the knowledge base is a basis for achieving the learning objectives of the programme. Research-based teaching requires research and interaction between researchers and students. The Danish higher education system can be characterised as a “binary system” with two fundamentally different types of institutions: universities and vocational colleges and vocational academies. The two sectors have different knowledge bases: professional programmes (e.g., teachers, nurses) and academic bachelor programmes.

Until recently, gender equality was one of the 6 assessment areas for **UKÄ** institutional reviews. The standard reads as follows: *The HEI uses procedures and processes to ensure that gender equality is systematically incorporated into the content, design and implementation of the courses and programmes.* Even though gender equality is considered an important quality aspect, it has proved difficult to capture accurately in UKÄ’s external QA activities. Therefore, this perspective will be tackled separately in thematic evaluations but will remain an element in the institutional reviews of research.

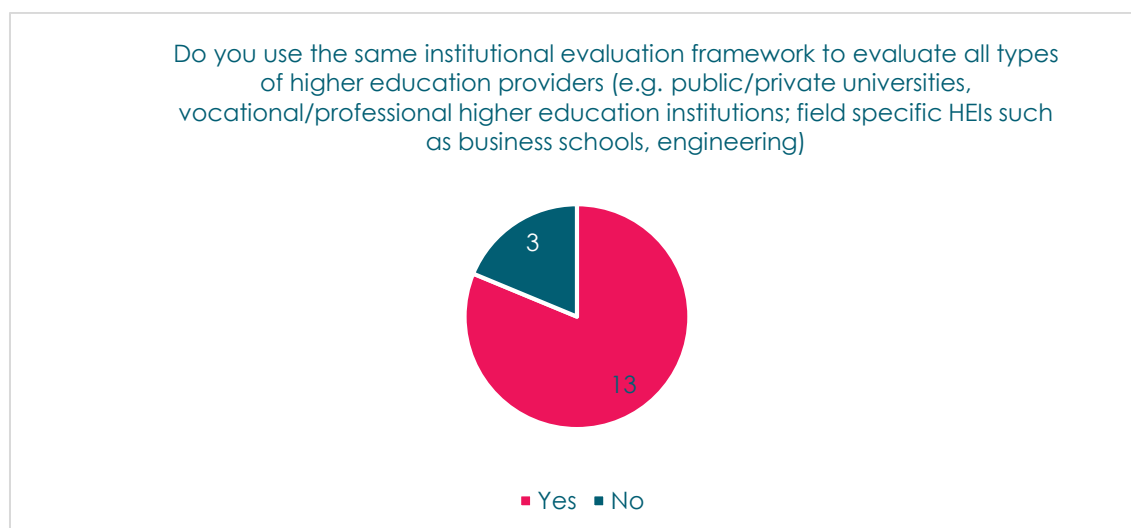
Beyond the question of including or excluding EQA topics, is the scope of an evaluation framework relevant to all the evaluated higher education institutions? How do agencies respond to the diversity of higher education institutions? These will be discussed in the next section.

Finding the balance between consistency and diversity

Given the diversity of higher education institutions and the specificities of each sector, a common challenge for quality assurance agencies is to develop sufficiently flexible approaches that take account of this diversity while ensuring consistency for all HEIs undergoing the same EQA procedure.

Figure 5 shows that a large majority of surveyed agencies use a common institutional evaluation framework to evaluate different types of higher education providers. This confirms that when addressing a diversity of HEIs, QA agencies can adapt an existing framework or expand its scope to encompass all types of HEIs instead of developing new tools. A distinction can be made between agencies operating with accreditation purposes. The study shows that all such agencies use the same institutional framework to evaluate all types of higher education providers, while diversity is evident among agencies conducting institutional reviews or certification. One responding agency (ARACIS) tackled “QA fatigue” through the merging of two frameworks to conduct a combined evaluation procedure that leads to two outcomes. More precisely, ARACIS included the standards of the EUR-ACE label (European Accredited Engineer) delivered by ENAEE (European Network for Accreditation of Engineering Education) in the framework for periodic evaluations. Two decisions are taken after an evaluation with these combined frameworks: a re-accreditation as part of ARACIS regular procedures and the award of the EUR-ACE label by ENAEE on the basis of ARACIS evaluation report.

Figure 5: Distinguishing Frameworks



Nevertheless, there are agencies that have developed or are developing sector-specific frameworks. Recently in some countries, art schools have been the centre of particular attention. In response, Hcéres, among others, have developed a dedicated framework to evaluate these types of schools at the institutional level (programme level evaluations were pre-existing). The evaluation framework was adapted from the existing institutional evaluation framework. The framework recognises artistic education activities through explicit references to the school's environment and directs the focus on their key objectives. Additionally, it progressively steers these institutions towards the three missions of the university model, with a set of adapted tools to understand the quality of the art school's research products and contribution to society. Further differentiation from sector-specific frameworks can be made, as illustrated in the QQI example below.

Box 5: Toward Differentiation. A single but flexible review model in Ireland.

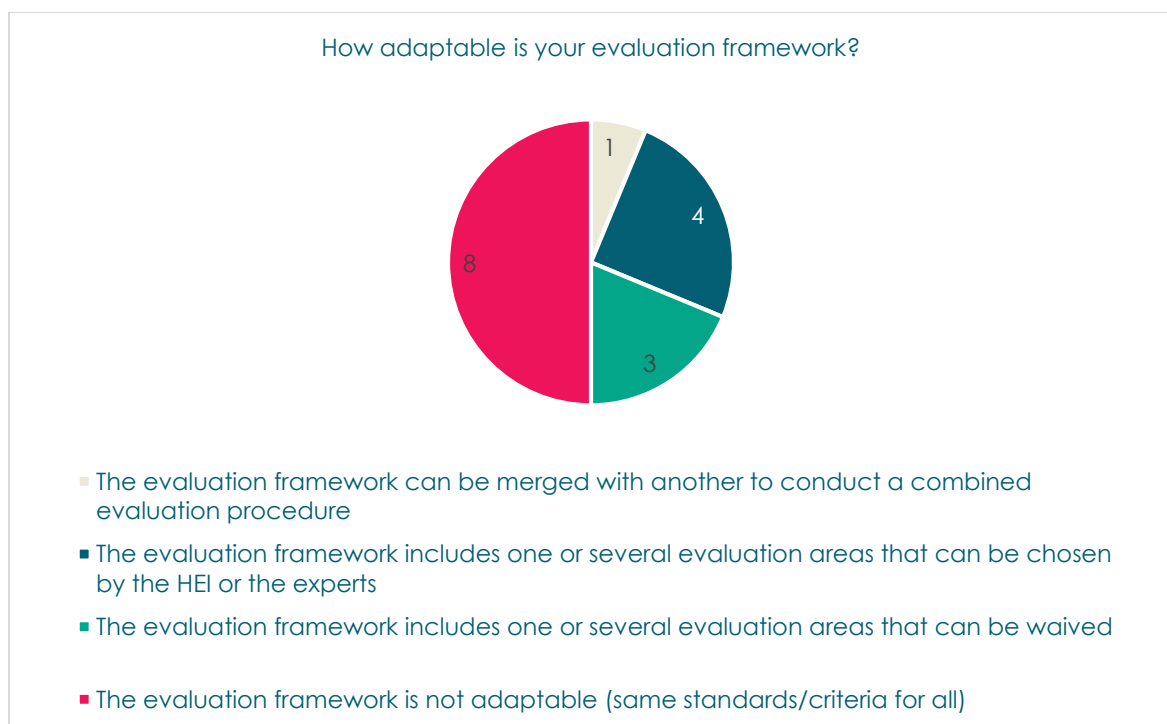
QQI has also developed several Terms of Reference for distinct provider groups (private and independent providers, institutes of technologies, universities...), but the reviews are based on a single model. The Terms of Reference for each different group of providers specifies 12 key areas that can be addressed but an institution has the flexibility to focus more closely on individual areas or even introduce others as appropriate, i.e., new governance structures for new technological universities. The rationale behind this “single but flexible review model” is the following: “though there are similarities between some institutions, there is a significant divergence between institutions in terms of mission, size and capacity. Hence, a single EQA model approach ensures transparency across the higher education sector, while the flexibility allows for differentiation in certain areas such as research, autonomy in making awards, delegated authority and the direct validation of programmes by QQI”. There is also scope for some flexibility and differentiation between reviews in the objectives set out in the Terms of Reference in the review team profiles and in specific methodologies (e.g., duration of site visit).

Thus, beyond the creation of new sector-specific frameworks, the fit-for-purpose approach in quality assurance can also be tackled through the flexibility of existing evaluation frameworks. Half of agencies state that they strictly apply all standards and criteria to all higher education providers while the other half have introduced some forms of adaptation, even if the external quality assurance procedures are still based on a single model.

Several models can be identified within agencies that have a flexible evaluation framework, as shown in Figure 6:

- 1) Waving some criteria that are not relevant to some HEIs,
- 2) Evaluation area on which the agency chose to focus,
- 3) Evaluation area entirely chosen by the HEI.

Figure 6: Adaptability of the Agencies' Evaluation Framework



The first model addresses minor amendments to the framework when criteria are not applicable to some HEIs. ANECA, for instance, allows some criteria to be excluded from the EQA procedure, at the request of the audited faculty or university, if the institution is not obliged to have them. This refers to criteria that are not strictly linked to compliance with the ESG, such as research, environmental considerations and internationalisation.

The second model was implemented in northern European countries (e.g., UKÄ, AI or NVAO NL) and are framed under the concept of audit trails. For each procedure, the panel of experts will choose several areas to which particular attention will be paid. This means that while the criteria are applicable to all, the focus on QA issues at one HEI may differ from one another. It is expected that this method will better suit a diversity of HEIs. The organisation of site visits will reflect this approach: these agencies will have one preliminary visit for the panel to have a general idea of the institution's overall context and quality management system and a second visit for focused interviews based on the audit trails that were selected during the first visit. This approach enables the panel to study an internal QA procedure and its implementation in detail.

The third model gives the university a central role in the evaluation process and allows HEIs autonomy to determine one of the areas for evaluation. This is exemplified in FINEEC's procedure: the Finnish framework comprises four evaluation areas of which one entitled "HEI as a learning organisation", is chosen by the institution undergoing evaluation. For the first three areas, assessment criteria and scales (excellent, good and insufficient) are applied. The panel's assessment of the fourth area is not included in the decision to award the audit certificate. The objective of the fourth area is purely directed at continuous improvement: the HEI will choose an improvement area relevant to its profile and/or strategy on which it would like to receive feedback from the panel.

Another example is AAQ, which offers a mixed approach consisting of both. During site visits, five discussions focused on a theme are organised, three are predetermined and are consistent for all visits, the fourth one discussion is chosen by the HEI and the fifth one by the experts. The last focus topic may not be selected from the standards and can be a topic that the HEI would like to discuss with experts without it being directly relevant to accreditation.

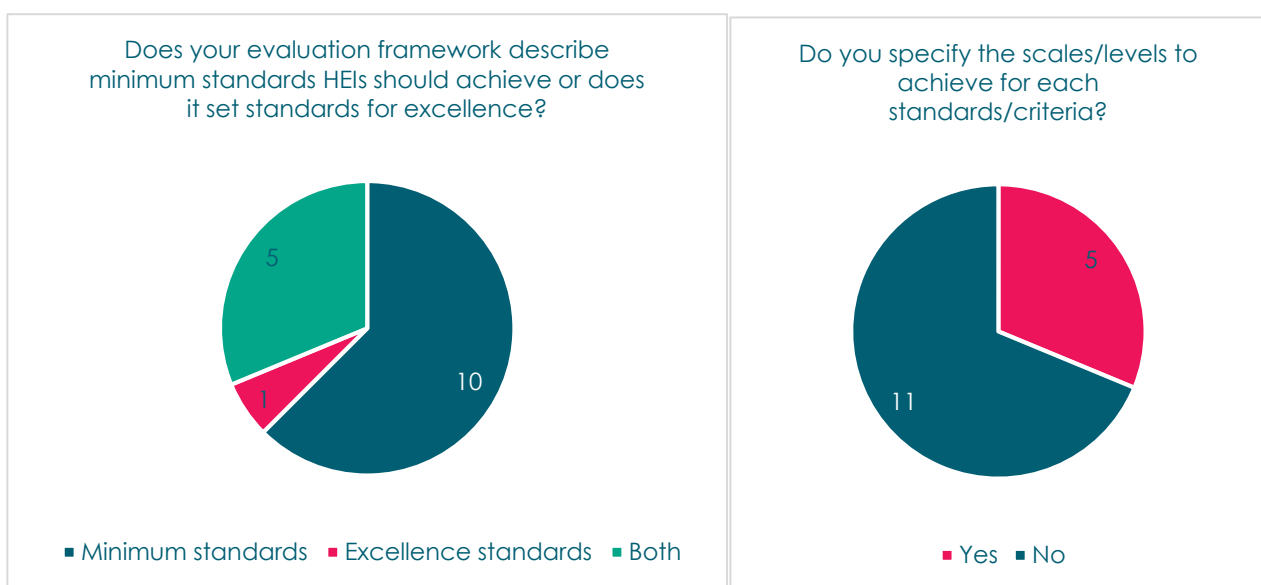
To conclude, most agencies are working with one fixed framework for all types of HEIs, but within this context, several agencies are addressing differentiation and fitness for purpose in their evaluation approaches adaption of the model. Furthermore, as most HEIs have or are about to experience their third or fourth EQA cycle, an evolution of the role of EQA is expected. In consideration of the progress made in response to a review, it is indeed logical that HEIs that have already been through the process would not expect to be reviewed again in the same way, or against the same criteria. The ESG, on which quality assurance agencies have based their evaluation framework, set threshold standards in the EHEA. After nearly two decades of existence, how can EQA continue to play a developmental role if the criteria that it sets are no longer challenging for mature and well-performing HEIs? This will be discussed in the following section.

To pass or to excel?

Should external quality assurance be limited to checking how HEIs meet minimum expectations, or should it also encourage excellence? The question is not new and has been addressed by Martin and Stella (2007) and in ENQA's occasional paper on the topic of excellence in higher education (ENQA, 2014). The question is of particular relevance today as HEIs are urged to excel and achieve a high standard in knowledge production and compete at an international level. From external stakeholders' points of view, such as ministries, excellence is a key criterion for the focus of public policies in higher education and research. In some countries, allocation of specific funds is also affected by these policies (Centres of excellence, French IDEX, etc.). In a competitive sector marked by the proliferation of rankings, the recognition of outstanding practices is strategic for attracting students, international collaboration with high-performing higher education institutions, research, etc.

Figure 7: Minimum Standards or Standards for Excellence

Figure 8: Assessment Scales



While quality assurance and enhancement has long been at the core of agencies' missions, the identification of excellence does not appear as the main focus of EQA as show in Figure 7. In the description of the outcome of the EQA procedure, judgements mostly follow a pass or fail model where the "highest" category is obtained when the HEI has met the expectations (QEF "Confidence/limited confidence/no confidence", NVAO-NL "meet"/"partially meet", "does not meet the standard" and "Effectiveness/limited effectiveness/not effective" for QAA Scotland). If excellence were to be seen as a philosophy of external quality assurance procedures, then evaluation frameworks should include it at the level of performance and set standards for excellence associated to it. Results from the survey are mixed in this respect. Most respondents describe minimum thresholds. In the "Use and Interpretation of the ESG", EQAR states that "standards are minimum requirements that have to be adhered to, based on agreed and accepted practice for quality assurance in higher education" (EQAR, 2020). Several agencies have adopted a similar definition, such as AQU ("The standards are specified in criteria that constitute the minimum requirements for institutional accreditation.") or UKÄ ("The assessment criteria are a minimum level for which the HEI must report in the self-evaluation").

If, by definition, a minimum standard must be achievable, it does not necessarily mean that EQA cannot serve a more ambitious purpose. In many agencies, panels are explicitly expected to highlight good practices, strong points or "commendations" (QAA, NVAO NL...) in institutions, but each panel is free to judge what is a good practice, based on evidence and consistency checks. The formative evaluation approach as defined above may explain why agencies are reluctant to standardise excellence. AQ

Austria, among others, has several degrees of fulfilment for each criterion, but does not describe in the evaluation framework what the HEIs need to do to achieve them. Defining a strictly comparable set of indicators for excellence from one HEI to another, may also come with the risk of creating a hierarchy, as most rankings aim to do so.

Institutional evaluation approaches do not seem to be fully designed for comparison purposes. If KPIs for excellence, such as the number of publications in renowned peer-reviewed journals, are noted during the evaluation (ie. bibliometrics reports supporting research evaluation at Hcéres), they are always part of a contextualised evaluation procedure. This includes an overall vision of excellence encompassing not only quality of the output, but also how it is embedded in the mission, objectives and processes of HEIs. Thus, EQA as peer-reviewed procedures offer an interesting alternative to rankings with where the level of quality is recognised in a collegial way, using a variety of qualitative and quantitative tools.

A few agencies have described several achievement levels (Figure 8), with a clear goal to distinguish HEIs who exceed minimum expectations. As already mentioned, the ARACIS method has defined “standards” as the minimum compulsory level of achievement for educational activities. There are also optional “standards of reference” which define the optimal level, based on existing national, European or international best practices. Each type of standard is associated with performance indicators that measures the level of accomplishment and identify outcomes. These vary from a specified minimum to maximum level. The maximum levels correspond to standards of reference, are optional, and differentiate the quality of an institution both hierarchically and progressively. ASHE also provide an interesting example of the use of achievement scales: each element of evaluation (and ultimately, the internal quality assurance process as a whole), is present in its three phases of development: initial, developed or advanced. Descriptions of each stage of development are provided in the evaluation framework example below (see table 3).

Table 3: Achievement Scales by Stage in the Croatian Framework

Elements of evaluation	Initial phase	Developed phase	Advanced phase
1. Quality policy The basis and the core of the process; general direction and goals related to the quality of all activities and processes whereby HEI mission statement is achieved.	Quality policy represents a common understanding of quality at the level of the entire HEI, and a framework for action at the institutional, national and international levels. Quality policy is in line with the strategic direction, mission and vision of the HEI, and is achieved in some activities and organizational processes. In creating and adopting developmental policies, HEIs use QAS data to some degree. Internal and external stakeholders are not included, or are insufficiently included, in this process.	Quality policy represents a common understanding of quality at the level of the entire HEI; it adequately reflects the general direction and goals related to the quality of all activities and processes, and represents a framework for action at the institutional, national and international levels. Quality policy is in line with the strategic direction, mission and vision of the HEI, and is achieved in main activities and organizational processes. In creating and adopting developmental policies, HEI uses relevant QAS data. Internal and external stakeholders are included in this process.	Quality policy represents a common understanding of quality at the level of the entire HEI; it adequately reflects the general direction and goals related to the quality of all activities and processes, values, ethical principles and good practice in quality assurance, and represents a framework for action at the institutional, national and international levels. QAS reflects the HEI's strategic direction and relevant and rational goals; there is a clear link between HEI's strategic goals and sustainable development of society as a whole. Quality policy is clearly discernible in all activities and organizational processes. In creating and adopting developmental policies, HEI uses relevant QAS data in order to create a stimulating environment for further development. Internal and external stakeholders are actively involved in this process, and contribute to the development of QAS.

An interesting discussion can be had around whether excellence in EQA should be integrated into current procedures or set out separately as a voluntary procedure. FINEEC uses a three-scale assessment system that identifies areas under evaluation as “excellent, good and insufficient”. To pass the audit, areas under evaluation areas should reach, at a minimum, a “good” level. FINEEC has also a “Quality Label for Excellence” in which HEIs that have received excellent levels in one or several areas are nominated as a candidate for the label. There is a separate process and criteria for awarding the “Quality Label for Excellence”.

Box 6: Finnish Procedure for Quality Label for Excellence

FINEEC audits of higher education institutions (2018-2024) include the opportunity of being awarded a Quality Label for Excellence. The Quality Label for Excellence is awarded to higher education institutions that have distinguished themselves with their commitment to enhancement work of exceptionally high quality.

A higher education institution can be nominated as a candidate for receiving the Quality Label for Excellence if the audit team grants the level “excellent” in one of the three evaluation areas assessed. The Quality Label of Excellence process is separate from the actual review process and carried out once a year during the current cycle. The assessment is conducted by a panel consisting of members from FINEEC’s decision-making body (Higher Education Evaluation Committee).

The following criteria are applied in the excellence assessment:

1. The higher education institution is an innovative forerunner and develops its operations in a bold and open-minded manner.
2. The higher education institution has top-level expertise in long-term development, and it can provide strong evidence of the impact of its development and enhancement activities.
3. The higher education institution has a positive impact on its surroundings. The higher education institution is known for engaging a wide range of actors in its development and enhancement activities and for crossing borders in an open-minded manner.

In FINEEC’s current audit cycle (2018-2024), three institutions have so far been granted the Quality Label of Excellence. By being awarded the Quality Label for Excellence, a higher education institution has demonstrated that it possesses an innovative and pioneering spirit, an approach that focuses on long-term development, and a participatory operating culture.

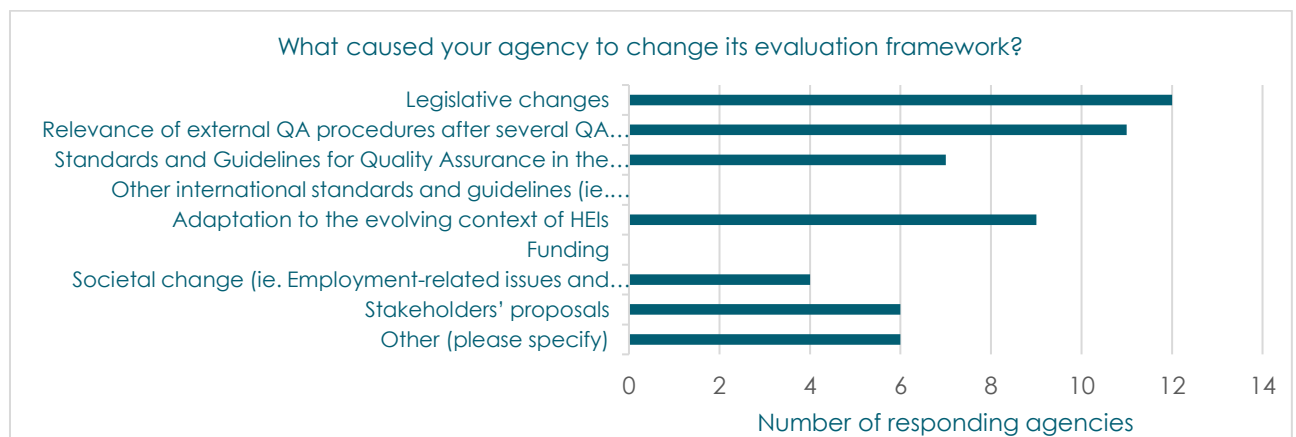
To conclude, evaluation frameworks are embedded in a national context and reflect a vision of the role of external quality assurance in a specific higher education system. As such, their *raison d’être* is not just technical or operational, but also, guided by political policy. More precisely, frameworks are the technical results of political decisions on the purpose (compliance, continuous improvement, excellence), its objectives, scope of evaluation (focus) and the expected outcome and impact. Part I of this QAN study has shown us examples of possible models (open or prescriptive, holistic or more targeted). These models are regularly reviewed as higher education institutions and systems evolve and changes occur in the operating environment affecting external quality assurance. Part II of this study explores good practice in the review processes of institutional evaluation frameworks.

Part II - Updating an Institutional Evaluation Framework – Why, When and How?

As quality is not static and since higher education systems evolve in line with societal change, evaluation frameworks should be regularly updated. The second part of this study presents practices of surveyed agencies regarding the update of their evaluation frameworks. How the involvement of stakeholders in the revision and updating process is addressed before also focusing on how agencies make their external quality assurance procedures more relevant over time, including whether they extend or narrow the scope of their framework. Last but not least, obstacles agencies face when revising and updating their framework are discussed.

With the exception of the GAC, where this is the responsibility of the Länder, all agencies surveyed are responsible for updating their frameworks. Overall, the study shows that half of agencies update their evaluation frameworks at the end of the cycle, although it is also common to introduce marginal revisions during the cycle due to legislative changes or developments in the higher education sector. The other agencies make regular revisions, but without a specific timeframe. Most agencies (70%) update their framework because of changes in national legislation and to ensure that their external quality assurance procedures are still relevant after several cycles (64%) (see Figure 9). It is also important to note that half of the agencies and a quarter of them respectively revise their institutional evaluation framework to adapt to the evolving context of higher education institutions and to consider societal changes (e.g., employment-related issues and skills gaps, sustainable development goals). This underlines the fact that quality assurance reflects the wider changes taking place in society and the context it serves. However, it is interesting to note that “other international standards and guidelines” and “funding” were not mentioned by any agency as an incentive to update their framework. As regards “other international standards and guidelines”, the responses show that the ESG remain most prominent in the EHEA and take precedence over other standards and guidelines, such as those developed by the International Network for Quality Assurance Agencies in Higher Education (INQAAHE).

Figure 9: Reasons why Agencies Update their Institutional Evaluation Framework



In order to test their updated evaluation framework, 6/16 agencies carried out a pilot procedure. NVAO Flanders and NOKUT provide interesting examples of pilot procedures (see Box 7).

Box 7: Testing a New Evaluation Framework with a Pilot - Flanders and Norway

The institutional review system and the new quality assurance system of **Flanders** (2019-2025) were piloted in 2016 and 2017 in a baseline assessment of all universities and university colleges. The pilot phase was positively evaluated by an evaluation group and an "international resonance group", both set up by the Minister of Education. These pilots and the close cooperation between the **NVAO** and Parliament resulted in significant changes to the Higher Education Law, which were approved by all members of Parliament.

NOKUT's third cycle of periodic reviews of institutional quality assurance practices ends in 2024. The agency therefore initiated a pilot project to test adjustments to its current review methodology in preparation for the fourth review cycle. The pilot project involved the cooperation of four large, research-intensive universities and was guided by ESG 2.2. "Designing methodologies fit for purpose". The project thus involved several internal and external reference groups, including the four universities, which monitored and developed the project in a relevant and consistent way. Key changes included less but more tailored institutional quality assurance documentation and a stronger focus on improvement issues during the site visits.

We can already see from these two introductory examples of pilot procedures that stakeholder involvement is key to the successful updating of agencies' evaluation frameworks. We will explore this issue in more detail in the next section.

Engaging Stakeholders, a Key Step in the Revision and Updating Process

The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG, 2015) consider that "Stakeholders should be involved in its [external quality assurance] design and continuous improvement" (ESG 2.2) to ensure that agencies design methodologies that are fit for purpose. In addition, ESG 3.1 states that agencies should involve stakeholders in their governance and activities. Therefore, it is important for agencies to ensure stakeholder involvement. Freeman (1984) defined stakeholders as "any group or individual who can affect or is affected by the achievement of an organisation's purpose". In the case of quality assurance agencies, a distinction should be made between external stakeholders (higher education institutions, national and local authorities responsible for higher education, students, higher education staff, employers etc.) and internal stakeholders (executive and non-executive staff of the agency). The QAN study focused more on the involvement of external stakeholders in the revision of institutional evaluation frameworks, but also provides some insights into the overall role of internal stakeholders.

Regarding external stakeholders, the study on "Effective involvement of stakeholders in external quality assurance activities", ESQA (Homan et al, 2020) has increased knowledge of the role and importance of stakeholders in quality assurance. Indeed, in the ESQA study, 70% of respondents considered stakeholder involvement made quality assurance systems more comprehensive and responsive to societal needs, and is, therefore, one of its key objectives. One of the key findings was the identification of the type of stakeholders involved in the development and revision of external quality assurance standards and procedures. It showed that teaching staff, students, and other staff of higher education institutions were the three main types of stakeholders involved in the revision process, while student unions, local authorities and civil society were the least involved.

In the QAN study, the scope of stakeholders under consideration varied slightly from the aforementioned ESQA study. The QAN study broadened the scope to include professional consultants, researchers specialised in HE and QA, as well as other QA agencies. It also included "experts who have participated in previous evaluations" as a specific type of stakeholder, as well as students and academic staff. However, compared to the ESQA study, the QAN study does not focus as much on different types of unions (teachers' and students' unions).

The analysis of the QAN confirms the main findings of the ESQA study: the type of stakeholders who are the most involved in the revision process are students, academic staff, university management, and HEI administrative staff (included under “other staff of HEIs” in the ESQA study) (see Figure 10). However, they are mostly consulted because they were former experts who had been involved in the agencies' external quality assurance activities and not just because they were students or HEI staff. This demonstrates that agencies also value feedback from stakeholders who participate in their activities. Similar to the ESQA study, the results of the QAN study show that civil society and local authorities are the least consulted. The three new types of stakeholders included in this study give interesting results: other QA agencies, researchers with expertise in HE and QA, followed to a lesser extent by professional consultants, are also respectively consulted by 76%, 58% and 35% of responding agencies. The following box provides an example of an agency consulting with peer agencies when updating its institutional evaluation framework, demonstrating that cooperation in quality assurance is key to improving agencies' practices (see Box 6). In addition to their direct counterparts, some agencies, such as FINEEC, also consulted representatives of key European stakeholders (ENQA and EUA).

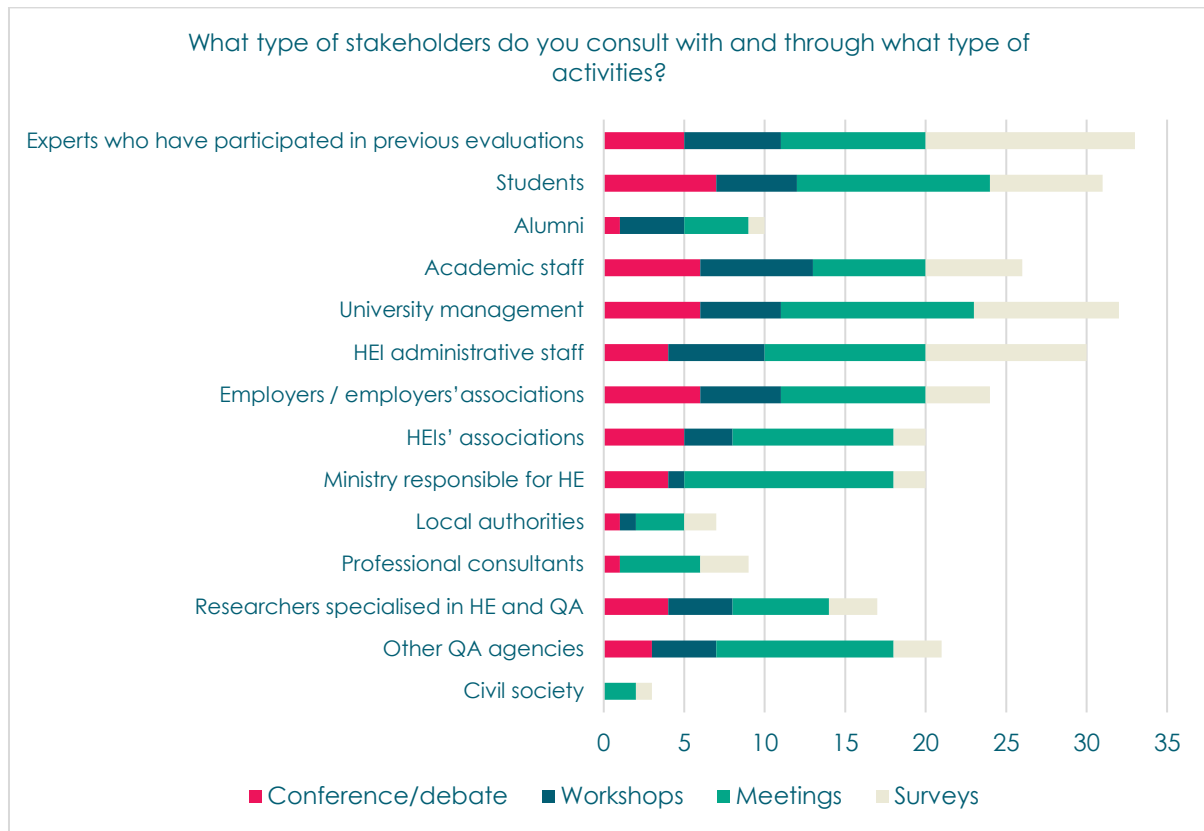
Box 8: AQ Austria Consultation with other QA Agencies to Revise its Frameworks

In the last thorough revision of its audit framework (and also of the accreditation decrees, which were updated at the same time), **AQ Austria** benefited from various international perspectives. On the one hand, at least five of the 14 members of the AQ Austria Board must come from other countries and thus from other higher education systems than Austria. A working group with staff of the AQ Austria secretariat and members of the board was set up to rethink and develop a revised audit framework. This work was based on some principles that the agency had generated at the very beginning of the revision process by conducting surveys among staff, board members, reviewers (i.e., experts) from previous procedures and HEIs as well as on the results of studies that the agency had carried out earlier. Given the fact that about 60% of the reviewers appointed by AQ Austria for its external quality assurance procedures come from abroad, the agency was already able to make use of the international perspective at this point.

A draft of the revised framework was discussed with representatives from different HEIs who held different positions. After further internal steps, representatives of different stakeholders were invited to a workshop. This was the time that two senior staff of other quality assurance agencies (AAQ Switzerland and NOKUT Norway) were involved. After an introduction about the reasons for the revision and the principles that had been guiding the agency, the draft of the revised frameworks was presented. Key questions prepared beforehand guided the workshop so that AQ Austria could get different thoughts and inputs from the stakeholders as well as from the two foreign agencies. In a separate debriefing, the two agencies shared their impressions and provided advice for further consideration.

Further steps prior to the Board's decision included the use of various workshop results and discussion input from within AQ Austria and its committees, before launching a public comment procedure.

Figure 10: Breakdown of the Type of Stakeholders consulted by the Responding Agencies and the Type of Activities they Engaged with for the Update of the Institutional Evaluation Framework.



In terms of stakeholder involvement, the Figure 10 shows that most agencies prefer meetings with all types of external stakeholder, with the exception of former experts, who are mostly consulted through surveys. In the QAN questionnaire, meetings were defined as formal gatherings for the exchange of information, whereas workshops are practical and more interactive consultation experiences. The latter type of consultation was used less than surveys, but still accounts for a significant share of activities, especially for academic staff. Both FINEEC and AI provide interesting examples of how agencies can use all these types of consultation in updating their institutional evaluation frameworks through close collaboration and co-creation with their stakeholders (Box 9).

Box 9: Stakeholder Engagement in the Finnish and Danish Agencies

At **FINEEC**, the third cycle audit framework was designed with a participatory process involving representatives of the key stakeholders engaged. There were two main steps: drafting the new framework (1) and testing it through a pilot procedure (2).

Step 1: Drafting the new framework (December 2015 – January 2017)

A team of eight members was appointed to plan the new framework. Six of them represented the universities and universities of applied sciences (UAS), students and the socio-economic sector. Two FINEEC staff members also participated in the work of the planning team. The team thus worked on the new framework, its evaluation areas, criteria and procedure, ensuring that it was aligned with the ESG 2015 follow-up and reporting procedure.

Throughout the year 2016, various workshops were organised with the students' unions of universities and UAS, the rectors' conferences, the Ministry of Education and Culture, the quality networks of universities and UAS and the network of expertise in higher education pedagogy and academic development.

Additionally in October 2016, FINEEC organised a national seminar with participants representing the higher education institutions, students, the labour market and other stakeholder organisations in order to inform them about the draft framework and gather their feedback. In January 2017, the decision-making body approved the new framework for the third cycle of audits.

Step 2: Testing the framework through pilot audits (January 2019 – September 2019)

FINEEC tested its framework through two pilot audits and collected the feedback from the audited HEIs and the audit team through an online questionnaire in spring 2019. Feedback was also provided verbally by the audit team members as part of the audit process and during a workshop organised with the pilot HEIs and representatives of FINEEC.

As a result of the feedback, FINEEC made changes to the audit manual. The changes mainly concerned the criteria, the assessment scale and the self-evaluation guidelines. The revised framework was then discussed and approved by the decision-making body in September 2019.

The **Danish AI** involved the Council and the higher education sector in the development of the IA 2.0 framework at three different levels.

Level 1: Broad involvement

The AI held four separate meetings with the quality committees and other management representatives of each education sector: (1) universities and HEIs of fine arts, (2) business academies, (3) maritime educational institutions and (4) university colleges. In addition, the AI held a separate workshop with student representatives. The AI then invited the whole higher education sector to attend a meeting where it presented the framework and gave participants the opportunity to clarify uncertainties. The HEIs were then invited to write their formal responses into the draft framework.

Level 2: Focused involvement

In order to ensure close and continuous dialogue during the development phase, the AI established a dialogue group comprising two representatives from the universities, university colleges and business academies, respectively, one representative from the maritime educational institutions and one from the HEIs of fine arts. The Rectors' Conferences proposed the representatives, all of whom were QA managers. The AI held three seminars with this dialogue group to discuss how to implement the criteria in the new framework and to formulate them in a clear and useful way. Thereby, the design process was based on the ambition to co-create and build a partnership.

Level 3: High level involvement:

To ensure the relevance of the new framework to the stakeholders, the AI management team met with the Rectors' Conferences, the Danish Chamber of Commerce, Confederation of Danish Industry, the Danish Confederation of Professional Associations, the Danish trade union and the Danish Association of Masters and PhDs. These meetings gave the AI a deeper understanding of its stakeholders' needs.

When it comes to involving internal stakeholders, agencies seem to involve both their executive and non-executive staff while consistently relying on the feedback and expertise of external stakeholders (Box 10).

Box 10: Involving Internal Stakeholders in the Revision Process in Catalunya and France

At **AQU-Catalunya**, a working group consisting of the agency's technical advisor for methodology, project managers, and two external experts was set up to revise its institutional evaluation framework. The working group shared the revised document with the rest of the project managers and the senior advisors of AQU's Quality Assurance unit. After dealing with these initial comments and observations, the revised document was then discussed with managers of the internal quality assurance units of all the Catalan universities. The framework was revised based on their feedback and was then discussed and approved by the agency's Institutional and Programme Review Commission. This Commission is chaired by AQU's director and is made up of academics, students, and international and professional experts.

At **Hcéres**, revision is an ongoing process leading to marginal annual updates in the evaluation framework. The entire Department for Institutional Evaluations is involved in the revision of its institutional evaluation framework: project managers as well as chief, director, and academic advisors. Hcéres' academic advisors are academic staff who work part-time for the agency in addition to their academic responsibilities at their home university. The relevance of the framework is regularly discussed in departmental meetings, when reflecting on the ongoing external quality assurance activities, and in the Department's annual internal seminars. In 2023, the Department for Institutional Evaluations asked the Department for European and International Affairs for some information on the institutional evaluation frameworks of other QA agencies. The results of the benchmark carried out by the Department for European and International Affairs were used as food for thought in the internal seminar organised by the Department for Institutional Evaluations in June 2023 and influenced its new template for HEI self-evaluation. The template now includes reflective questions to further guide the HEI in writing its self-evaluation report.

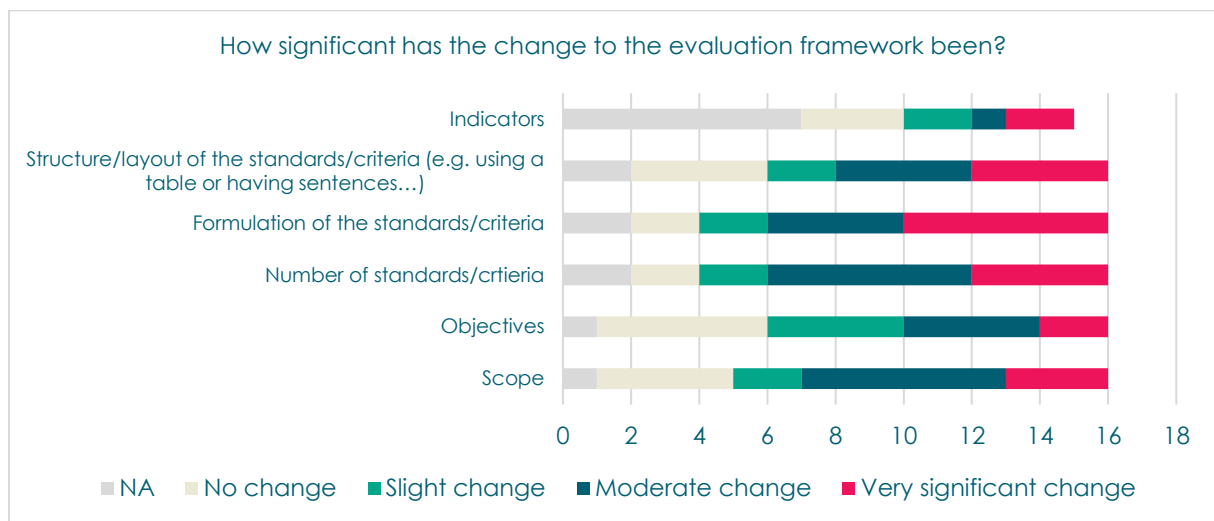
In the end, the involvement of stakeholders in the updating process provided agencies with key input and feedback. Some of this feedback was related to simplifying the external quality assurance process and making it more relevant and reduce "QA fatigue". The next section will address this topic.

Making External Quality Assurance Procedures more Simple and Relevant

All responding agencies to the QAN study have already undergone at least one cycle of external quality assurance procedures. It is therefore important for them to reflect on their procedure and prepare for the next cycle and make updates to the evaluation framework.

As outlined in the previous section, such a procedure is often based on consultation with stakeholders. For example, some of the responding agencies were invited to broaden the scope and include new topics in their framework. For example, research and innovation/transfer at NVAO-Netherlands, and the third mission of universities at QEF and Hcéres, wellbeing of staff and students and innovative operational culture at FINEEC. This was done to ensure the relevance of the framework in light of recent developments in their national context and the HE sector more globally. On the other hand, to improve efficiency of institutional reviews, UKÄ, which had experimented with several topics outside the ESGs, such as gender equality and "working life and collaboration", has recently decided to evaluate these topics differently (as part of thematic reviews for gender equality and integrated into other evaluation criteria when experts consider the perspective relevant). Other agencies were encouraged to make changes to their procedures, reducing the number of site visits from two to one at AQ-Austria and UKÄ, simplifying the process by reducing the numbers of documents required at UKÄ, and increasing engagement of the participants, especially students, during the site visit at FINEEC. Other feedback concerned the layout of the framework and the formulation of standards/criteria to make them more understandable (AQ-Austria, AQU, UKÄ) and the translation of national QA concepts into English at QEF. (See Figure 11).

Figure 11: Changes made by Agencies to their Institutional Evaluation Framework - by level of importance



In France, Hcéres revamped its external quality assurance procedures to better integrate the research and teaching components of the HEI in its institutional evaluations. It thus managed to offer more relevant and holistic procedures that were appreciated by its external stakeholders (Box 11).

Box 11: An Integrated Evaluation Process in France

Hcéres adopted an "integrated evaluation process" in September 2023, which is reflected in the institutional evaluation framework. This new framework and procedure are intended to provide HEIs with a more relevant and holistic approach to external quality assurance, which evaluates both the research units and study programmes of a given HEI when carrying out an institutional evaluation. Before that, the evaluation of research units, study programmes and HEIs used to be three separate procedures with few links. Hcéres has moved from an evaluation framework with six domains to one with three domains to meet the needs of this integrated process. This means that domain 1 is specifically dedicated to the governance of HEIs, while domain 2 is specifically dedicated to research and innovation and is thus fed by the synthesis of the department for research evaluation. Domain 3 is dedicated to education and campus life policy and is partly based on the result of the programme evaluations. Furthermore, the structure of the programme evaluation framework has been redesigned so that it mirrors the institutional framework (topics covered by standards are similar). This allows clear links between the micro-level (individual programmes) and the macro level (institutional education policy) in this new integrated evaluation process.

Figure – Hcéres' institutional evaluation framework and its links with research and study programme syntheses.



For many agencies, ensuring the relevance of their evaluation framework after several cycles has meant including new topics to broaden its scope, or limiting it to the core topics and avoiding "QA fatigue". The next section reflects on the debate about the scope of the evaluation framework in light of the findings of the QAN study.

Broadening or Limiting the Scope of an Evaluation Framework to the Core Topics? A tricky question

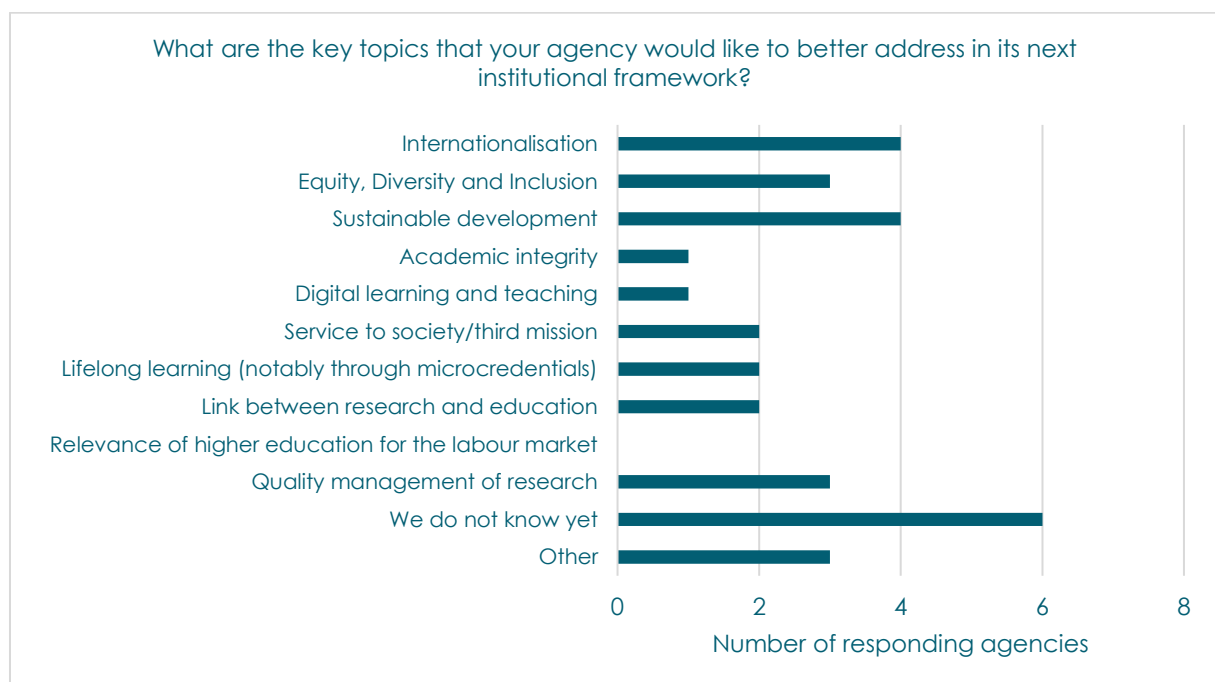
The scope of the evaluation framework is currently a hot topic in the European Higher Education Area and has already been discussed in several regional events, in particular in the 2018 European Quality Assurance Forum with the theme "broadening the scope of QA". The announcement that a revision of the ESG 2015 that will be proposed to the BFUG Ministerial conference in 2027 has fuelled debate.

Although the QAN questionnaire did not include a specific question on possible reasons for favouring or opposing potential topics to be included in external quality assurance procedures, several agencies took the opportunity to share these opinions. Oral feedback was also gathered during the 2023 QAN seminar that proceeded the questionnaire. Agencies in favour of expanding the scope of their institutional evaluation framework put forward several arguments in the QAN study:

- Adapting to the evolving context of higher education and societal changes (see Figure 5). The current "hot topics" being discussed in the EHEA are the QA of research, service to society/ the third mission, social dimension, academic integrity and micro-credentials.
- Making EQA more holistic, going beyond the teaching and learning focus of the ESG to encompass all three missions of HEIs and support HEIs through continuous improvement on that topic.
- Responding to legal obligations and national requirements, including those asking that EQA have an impact on HEIs' policy and, in turn, on society.

One of the questions in the QAN study asked agencies directly what topics they would like to better address in their next institutional evaluation framework (see Figure 12).

Figure 12: Topics Agencies would like to better address in their next Institutional Evaluation Framework



The results were quite surprising when compared with the comments agencies made throughout the questionnaire, which often touched on the scope of their frameworks. Most agencies do not yet know what new topics they would like to better address. One reason for this may be the stage of the cycle and it being too early for the agencies to indicate any new topics. Ultimately these will be decided as part of a revision process involving various stakeholders. The most popular topics mentioned were the internationalisation of HEIs and sustainable development. Figure 4 showed that agencies do not currently have a strong focus on internationalisation, but Figure 12 indicates a willingness to further develop this focus in the coming years. Although sustainability was indeed identified by Paul Giller (2023) as a new topic that agencies include in their frameworks, he also noted that research and the third mission have gained interest. In Figure 9, we showed that the activities of several agencies were driven by a desire to adapt external quality assurance procedures to the evolving context of HE and societal change. This may be the case with the broadening of some institutional evaluation frameworks to incorporate research. Indeed, a recent study by the EUA (2023a) showed that 95% of HEIs cover research in their quality management system, compared to 80% in 2010 (EUA 2023a). Therefore, agencies' interest in research and the number of agencies that have recently incorporated research activities in their institutional evaluation framework, may be related to the evolution of HEIs' activities.

It should be noted, however, that some of the QAN agencies already cover a broad scope of HEI activities in their framework as they work on the institutional level. The focus is not only on learning and teaching, but also on research, internationalisation, societal objectives, university governance, and sometimes other aspects like sustainability or gender equality. For instance, ANECA's new institutional framework responds to the need for EQA to better support transformative learning for sustainable development in higher education (Janssens et al, 2022) and provides an interesting example of an agency that has broadened its framework to include the transversal concept of "global sustainability" (see Box 12).

Box 12: Incorporation of Global Sustainability in one of the Spanish Institutional Evaluation Frameworks

ANECA considers agencies to be key actors in global sustainability. According to ANECA, agencies' evaluation frameworks need to better address the interplay between the ESG and the Sustainable Development Goals to provide a more comprehensive and holistic approach. The Spanish agency has worked on its evaluation framework to ensure that the HEIs embrace sustainability concerns into their three missions and daily activities. ANECA therefore invites agencies to consider "society and nature as stakeholders of universities" (ANECA, 2022). In order to design relevant institutional evaluation frameworks that take account of sustainability and at the same time have fit-for-purpose procedures, ANECA is exploring the possibility of setting up commissions in a number of specific areas, composed of national and international academic, student, and professional experts.

Some research has shown that broadening the scope of quality assurance beyond teaching and learning can strengthen the quality culture (O'Sullivan & Lynch, 2018), but some agencies included in the QAN study explained that broadening the scope of their framework also presented some challenges:

- Incorporating new topics in the framework may threaten the autonomy of the HEIs and their ability to respond to societal challenges in their own way. Making use of normative criteria in external quality assurance may contribute to this fear and run counter to the principle that HEIs are responsible for their own quality and establishment of appropriate internal quality assurance, as stated in the introduction of the ESG.
- The HEI community suffers from "QA fatigue" and wants simplification. This is especially in those countries where two or more cycles of the same procedure have been completed and the frameworks (either the legal regulations, the guidelines of the agencies, or both) do not consider the fact that HEIs and their internal quality assurance are constantly in the move.
- The EQA is at risk of becoming superficial and having little impact on quality enhancement in HEIs. This experience comes from agencies whose procedures already do go beyond learning, teaching and research and which are at the same time requested to work efficiently. Efficiency

refers to the (same) number of experts, the (same or even shorter) duration of site visits and the (decreasing) quantity of the documents submitted by the HEIs.

- Broadening the scope of the institutional evaluation framework makes it too challenging for agencies to keep their process relevant and within a reasonable timeframe – for example, it is difficult to find experts for new topics and to work with a larger group of reviewers to cover all topics properly.

Whatever the nature of the update and revision of institutional evaluation frameworks, agencies may face some obstacles. The next section discusses the obstacles encountered by the agencies surveyed and attempts to suggest some solutions.

Obstacles to the Revision and Update of Institutional Evaluation Frameworks

The obstacles to revising and updating the institutional evaluation frameworks examined in this QAN study were twofold: resistance from the stakeholders and national legislation.

Regarding stakeholder resistance to amendments to the evaluation framework, the majority of agencies indicated this not to be the case. This result is encouraging and can be attributed to the above-mentioned wide stakeholder involvement in the process of updating or revising the frameworks. The fact that agencies intend to make the procedures more meaningful, and at the same time less work-intensive for the HEIs, could also contribute to the acceptance of change (see chapter on « Making the external quality assurance procedures simpler and more relevant »).

However, two agencies reported that they had encountered serious resistance to changes in their framework. One was concerned with students no longer having the same importance and influence due to the evaluation criteria concerning students being changed (see Box 13).

Box 13 Resistance to Changes to the Evaluation Framework in Sweden

Over the past two years, **UKÄ** has worked hard to develop and improve its framework. Accordingly, the agency has made several changes to its guidelines for the review of higher education institutions' quality assurance processes for education and research. The objectives were to eliminate overlaps, make the language clear and explicit, and minimise the number of criteria in order to reduce the administrative burden on HEIs without losing important content. In the previous guidelines (2017-2022), there was an assessment area dedicated exclusively to the perspective of students and doctoral students. The criterion read: "The HEI's procedures and processes systematically promote the ability and conditions of students to exercise influence over their studies and their study situation". In their new guidelines, there is no such assessment criterion, but the student perspective is partially integrated into the other assessment criteria.

Overall, the Swedish National Union of Students has welcomed the changes to the guidelines. However, they have expressed concerns about the risk of losing the student perspective in both the self-evaluation and the expert panel reports, now that there is no longer a specific evaluation criterion. To address this issue, UKÄ has included instructions in the guidelines (outside of the criteria) emphasising the responsibility of HEIs to highlight in the self-evaluation report how and in which of the quality assurance processes they work with the perspective of students and doctoral candidates. In addition, the Swedish National Union of Students is particularly critical of the deletion of the phrase "student influence" in favour of the phrases "involvement" and "engagement". They believe that the influence of students and doctoral students on their studies and their study situation is very important and could be lost as a result of this change in wording. However, UKÄ has proceeded without changes. Partly because this aspect of influence is already regularly monitored by its legal department. Partly because its experience from previous cycles shows that there is a lot to improve at universities in terms of involvement and engagement, and the agency believes that such improvement will also have a positive effect on the importance and influence of students at universities.

The second concern reported by an agency (NVAO Flanders) came from HEIs, which were strongly opposed to the idea of including mandatory evaluation themes with key topics as this would affect the autonomy of HEIs in their attempt to respond to the societal changes that they face within the context in which they operate. Admittedly, the topics are always contextually defined and addressed by each institution.

Both concerns touch on key issues of quality assurance that underpinned the Bologna process since its inception and have been reaffirmed in the last two Ministerial communiqués of the EHEA (Paris 2018, Rome 2020): the recognition of students as central stakeholders and the respect for the autonomy of HEIs. Agencies aligned with the ESG – all those responding to the QAN survey do – have to adhere to the principles of placing students at the centre of the teaching and learning processes of a HEI. The 2023 EUA Scorecard on University Autonomy in Europe IV defines quality assurance as a challenge for HEIs in terms of autonomy and accountability: “While there needs to be a framework for appropriate quality assurance processes, associated regulations can be burdensome and restrictive” (EUA 2023b, p.18).

As regards the constraints imposed by national legislation to the updating of their institutional evaluation frameworks, the QAN study found that 75% of the responding agencies have no such constraints. HEIs are held accountable for their quality, and quality assurance agencies, which have the task of reviewing the HEIs' mechanisms for ensuring and further developing this quality, need a legal basis for their work. The results of the QAN survey show that frameworks usually need to be aligned with legal regulations. Nevertheless, for one agency (QOI) this was not considered a constraint while for others such as NOKUT, whose framework consists only of legal requirements, it is. This may be particularly problematic when national legislation has not been updated to take into account the fact that HEIs have already undergone one cycle of external quality assurance procedures and are now already in the second, third or fourth cycle, which results in different needs. If the legal regulations do not allow for flexibility, they can be considered as constraints.

The case of the Quality Board for Icelandic Higher Education (QEF), however, may be seen as ideal for the continuous development of higher education. Indeed, while preparing its third cycle of evaluations, QEF intends to introduce some changes in its external quality assurance procedure. These will require some changes in the national legislation framework respectively and will be based on close dialogue between QEF and the relevant ministry. However, even where agencies indicated that they had faced constraints, most still tried to use the leeway provided by the legislation to develop their procedures. (see Figure 9).

To prevent obstacles to revising and updating institutional evaluation frameworks, engaging in dialogue with key stakeholders, including the ministries responsible for defining legislation under which an agency operates, is crucial.

Conclusion

The QAN 2023 study focused on institutional evaluation frameworks, which are central documents steering the external quality assurance of higher education institutions. Although the ESG provide the common standards underpinning evaluation frameworks within the EHEA, the frameworks of the QAN agencies vary enormously in their form and content. The study showed that highest variation can be observed in the frameworks at the level of criteria. ESG allow for this variation by rightly recognising that one single approach to quality assurance is not possible due to the great diversity among European countries. The institutional frameworks of the QAN agencies are not only a testimony of this approach but show how strongly EQA is tied to the contexts in which QA agencies operate.

The study highlighted differences between prescriptive and open evaluation frameworks, although the former are not so common. Open frameworks allow more flexibility and contextualisation based on HEIs' own choices. Open frameworks with less explicit criteria may, however, introduce new risks in the form of less transparent and subjective approaches to EQA. More detailed and prescribed requirements create more consistency but on the other hand, prescriptive criteria may hinder HEIs' autonomy, ownership and own initiative. The survey also showed that criteria/standards of most institutional evaluation frameworks describe minimum thresholds. The identification of excellence does not appear as the main focus of EQA. Should the bar be raised after several cycles of EQA and better recognise excellence? While external quality assurance has the potential to promote excellence in higher education through methods that combine qualitative and quantitative data, it should not emphasise competition between institutions.

How can we ensure that the external evaluation processes are tailored to the needs of HEIs if one common framework is used for all type of higher education providers, as most of the QAN agencies do? Examples of flexible frameworks were highlighted in the study: agencies have experimented audit trails, or set the choice of enhancement areas by HEIs or expert panels to make their methodology more fit-for-purpose.

The QAN study sketched a landscape of agencies working mainly in mature higher education systems and the demands such contexts place on EQA. QA agencies and their evaluation frameworks need to bring added value, be relevant and efficient. The activities of several agencies were driven by a desire to adapt EQA procedures to the evolving context of HE and societal change as well as to make the procedures more meaningful. Many of the agencies have renewed their frameworks from one cycle to another as systems evolved and societal changes occurred.

While agencies are working in set cycles which often do not allow immediate reaction to developments, the pace of change in EQA and evaluation frameworks respectively is far greater at national and agency level than at European level. Although the study showed that the ESG as a European evaluation framework is very important for the QAN agencies to adhere to, the impact of the national context on the institutional evaluation frameworks seems far greater than the ESG. The several cycles of EQA have also shaped the agencies' approaches to the design and revision of the institutional evaluation frameworks. The experiences of the QAN agencies highlighted the importance of grounding the evaluation frameworks in their context. Key external and internal stakeholders are involved in the revision and design processes to ensure acceptance of the evaluation frameworks. It is mainly through these participatory design and revision processes at national and agency level that new topics, ideas and innovations are introduced in the institutional evaluation frameworks.

There are many ongoing discussions concerning the future of EQA both at national and international level that touch upon the purpose, added value, effectiveness and scope of EQA, among others. There is increasing awareness among many EQA actors of the importance and value of trust, autonomy of HEIs and enhancement-oriented approaches, which also came across in the accounts of the surveyed QAN agencies. Although all evaluation frameworks include elements of compliance and enhancement to varying degrees, the role of enhancement as a driver of change and improvement is clear. The decades of institutional evaluations have built up the understanding of quality culture and organisational development at HEIs. The higher education institutions' ownership and participation in the process is vital. Quality is ensured and

improved from within the institutions not from outside, as also stated by Harvey and Stensaker (2008) in their seminal paper on quality culture.

A revision of the ESG 2015 has been announced and the widening of its scope is debated at the European level. Widening of the scope is by no means a new topic for the QAN agencies. Many of the QAN agencies already cover a broad scope of HEI activities in their framework that go beyond teaching and learning. Nevertheless, the QAN survey also points out to the risks of widening the scope of EQA. Adding new topics to evaluation frameworks may threaten the autonomy of HEIs and their abilities to respond to the societal changes in their own way. This is especially the case with evaluation frameworks that use very prescriptive criteria. The HEI community suffers also from QA and evaluation fatigue and there is a strong desire for simplification. EQA is also slow to change and does not fully keep up with the constant change in the higher education sector and internal quality assurance and enhancement of HEIs. Some surveyed agencies with very broad frameworks also recognised risks in too broad focus coupled with demands for efficiency in EQA implementation. This may lead to superficial and simplistic EQA exercises with minor impact on the enhancement of HEIs' activities and with a reputational risk for the agencies as well.

The practical implications of broadening the scope were further discussed during the QAN 2024 seminar in Stockholm, organised by UKÄ. Some challenges include the recruitment of experts, as widening the scope also implies widening the competence of the panels. If adding a new area in an evaluation framework might appear effortless, it challenges agencies in their struggle to maintain EQA efficient, time and cost-effective. Following a metaphor elaborated by Dagmar Provijn (NVAO FL): "In our quest to be relevant, we risk ceasing to be. As agencies are like snails, lagging behind HEIs, we shall maintain an open dialogue and important topics will be put forward by the HEIs themselves". Finally, as evaluation frameworks are also about setting core values, some agencies emphasised the importance of stability rather than reflecting all international and national political trends.

While it is important to not overload the institutional evaluation frameworks, it is important to recognise that the institutional evaluation approaches have great potential to address wide topics that challenge the higher education sector and societies. The institutional evaluation frameworks have a great potential to support HEIs' capabilities for change and improvement. The importance of trust, respecting the autonomy of the HEI, building on ownership and engaging the higher education institution and stakeholders in the process came across as important aspects in the survey. While compliance and enhancement are part of all EQA activities, enhancement will pave the way for the future in supporting higher education systems in Europe to improve and excel.

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Sources

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Survey Questions

Section 1: Identification of the procedure

Agencies may have several procedures conducted at the institutional level. For the sake of analysis and comparability, one procedure will be chosen and described in Section 1. Sections 2 and 3 will be based on the chosen procedure.

1- What is the focus of the chosen institutional procedure?

- Audit/evaluation of the internal quality assurance system
- Audit/evaluation of the overall functioning of HEIs (including IQA)

2- Description of the chosen procedure:

Name of the procedure	
Link to the procedure on your website	
Type of HEIs targeted by the procedure	
Approx. number of evaluated HEIs per year by your agency with the chosen procedure	
Length of the evaluation cycle (if any)	
Outcome/decision: quality review, label, accreditation, certification.	

3- Are the decisions linked to any direct legal or financial consequences or is the procedure only for quality enhancement purposes? (ie. budget, right to operate, right to open new programmes, supporting the strategic dialogue between the Ministry and the HEIs...)

- No
- Yes (please comment):

Section 2: Institutional evaluation framework – Scope & Design

The design of an evaluation framework, and the concepts used to describe them, vary substantially from one agency to another. Evaluation frameworks can be divided into different categories such as domains/evaluation areas, standards, criteria and/or guidelines that will define the scope of the audit/review/evaluation. This section provides an overview of the different types of existing evaluation frameworks.

- 4- **Please provide a short description of your institutional evaluation framework and how to “read” it.** How is it structured (domains/topics, standards/criteria and their subsections etc...)? If relevant, please distinguish between the prescriptive principles that higher education institutions must meet/achieve (referred to in the ESG as 'standards') and the principles that are intended to guide higher education institutions (referred to in the ESG as 'guidelines'). You can provide an example with an extract from your evaluation framework.

5- What is the focus of your institutional-level audit/review?*

Topic	Small focus	Strong focus	No
Teaching and Learning			
Research			
“Third mission” and service to society			
Strategy and governance			
Quality assurance system			
Links to employment/industry			
Facilities and infrastructure			

Administration of the institution (accounting, reporting etc.)			
Support services			
Appointment/careers/personnel/HR			
Involvement of stakeholder			
Internationalisation			
Other (please specify)			

6- Do you use the same institutional evaluation framework to evaluate all types of higher education providers (e.g. public/private universities, vocational/professional higher education institutions; field specific HEIs such as business schools, engineering schools, art schools...)

- Yes
- No

7- If no, please list the different evaluation frameworks you have and the type of HEIs they target.

8- How “adaptable” is your evaluation framework?

- Our institutional evaluation framework is not adaptable (same standards/criteria for all)
- Our institutional framework includes one or several evaluation areas that can be waived for more focused audits/reviews or “lighter” procedures. Please describe.
- Our institutional evaluation framework includes evaluation areas that can be chosen by the HEI. Please describe
- Our institutional evaluation framework includes one or several evaluation areas that reviewers can focus more on in the institutional audit. Please describe
- Our institutional evaluation framework can be merged with another evaluation framework while conducting a combined evaluation procedure (ie. institutional review combined with a quality label such as CeQuint, national labels, the European Approach etc....)

9- How do you phrase your audit/evaluation requirements?

- Standards/criteria defined by the law
- Standards/criteria defined by the agency
- Open questions
- Other

10- Do you express your standards/criteria qualitatively or quantitatively?*

- Qualitatively
- Both
- Quantitatively

11- Do you specify the scales/levels to achieve for each standards/criteria?*

- Yes
- No

12- Does your evaluation framework describe minimum standards HEIs should achieve or does it set standards for excellence?*

- Minimum standards
- Excellence standards
- Both
- Other:

13- What is/are the most difficult standards/criteria to achieve for HEIs?

Section 3: Changes made to the institutional evaluation framework since 2018

14 - How often do you revise your institutional evaluation framework? Does it happen at a particular moment (ex: end of an evaluation cycle)? When was the last time you revised your evaluation framework?

15 - What caused your agency to change its evaluation framework?

- Legislative changes
- Relevance of external QA procedures after several QA cycles
- Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)
- Other international standards and guidelines (ie. INQAAHE GGP/ISG...)
- Adaptation to the evolving context of HEIs
- Funding
- Societal change (ie. Employment-related issues and skills gap, sustainable development goals...)
- Stakeholders' proposals
- Other (please specify):

16 - How significant has the change to the evaluation framework been?

	No change	Slight change	Moderate change	Very significant change	Not applicable
Scope					
Objectives					
Number of standards/criteria					
Formulation of the standards/criteria					
Structure/layout of standards/criteria (e.g. using a table or having sentences...)					
Indicators					

17 - Briefly describe the “very significant changes” (or “moderate changes”) that have taken place.

18 - Briefly describe one concrete example of change made to the institutional evaluation framework and the (expected) impact.

19 - Briefly describe your latest procedure to update your institutional framework. What were the key steps? What external stakeholder were involved? What internal stakeholders (from your agency) were involved?

20 - What stakeholders did you consult with and through what type of activities? Please fill in the table below.

	Type of consultation activities			
Type of stakeholders	Survey	Meetings	Workshops	Conference/debate
Experts who have participated in previous audit/evaluation				
Students				
Alumni				
Academic staff				
University management (

HEI administrative staff				
Employers / employers' associations				
HEIs' associations				
Ministry responsible for HE				
Local authorities				
Professional consultants				
Researchers specialised in HE and QA				
Other QA agencies				
Civil society				

21 – If you wish to give more detail on the type of activities you organise to involve the stakeholders in the updating process of your evaluation framework, please provide a description in the box below.

22 - If you involved stakeholders in your activities, please give one or several examples of key inputs/feedback they provided and how it is captured in the evaluation framework.

23 - Have you encountered any resistance to changes in the evaluation framework from your stakeholders? Please describe

24 – Do you face any constraints in updating your institutional evaluation framework due to national legislation?

- Yes
- No

25- Did you test the new evaluation framework through pilot audits with a set of HEIs before applying it to your regular procedure?

- Yes, we tested the new evaluation framework through pilot audits
- Not yet, but we plan to test our new evaluation framework through pilot audits
- No, we did not

26- What are the key topics that your agency would like to better address in its next institutional framework (3 maximum)?

- Internationalisation
- Equity, Diversity and Inclusion
- Sustainable development
- Academic integrity
- Digital learning and teaching
- Service to society/third mission
- Lifelong learning (notably through microcredentials)
- Link between research and education
- Relevance of higher education for the labour market
- Quality management of research
- We do not know yet
- Other:

27 - The ESG identify accountability and enhancement as the twin purposes of quality assurance (ESG, p7). How does you agency balance both purposes at the moment and how will this evolve in the next updates and reviews of your evaluation framework? (optional question)

