



## **STATEMENT ON THE FUTURE OF THE ESG AND ON EMPOWERMENT OF EQAR**

### **Summary**

The European Students' Union calls for keeping Quality Assurance as a priority within the Bologna Process. Quality Assurance should be flexible enough and aim at enhancement of quality of higher education in the context of the changes and challenges that higher education in Europe has to face. ESU thinks that it is vital that quality assurance enjoys ownership of all internal and external higher education stakeholders including higher education institutional governance, academic and administrative staff, quality assurance agencies, students, governments and employers in terms of its improvement and sustainability. ESU emphasises the importance of the role of students in the process of quality assurance in order to ensure representation and transparency.

ESU strongly believes that all the main higher education stakeholders should continue working together on the improvement and implementation of the European Standards and Guidelines for Quality Assurance and the empowerment of the European Quality Assurance Register. The impact sought when establishing those European tools has not yet been achieved and a deprioritisation can only lead to an inefficient system that fails to deliver on its promise.

### **Introduction**

Within the Bologna Process, Quality Assurance has been a crucial action line in the establishment and development of the European Higher Education Area. It has been a key to, not only ensuring the quality of Higher Education, but also facilitating the comparability of qualifications, increasing mutual trust in and acceptance of national quality assurance systems, and enhancing reciprocal recognition throughout Europe.

However after some years of intensive work in the field at institutional, national and European levels, there seems to be a perception from the side of governments that Quality Assurance has been developed enough and that there is no need to keep up the efforts in this field. On the other hand, complementing this view, it seems that Quality Assurance is being asked to deliver on areas where it cannot and thus there is a threat that QA will be perceived as less important, somewhat a victim of its own success.

*ESU – The European Students' Union - is the umbrella organisation of 45 national unions of students from 38 countries, and through these members represents over 11 million students. The aim of ESU is to articulate and promote the educational, social, economic and cultural interests of students at a European level towards all relevant bodies and in particular the European Union, Bologna Follow-Up Group, Council of Europe and UNESCO.*

The European Students' Union (ESU) agrees that in the past years there has been significant positive development in the QA frameworks, systems and mechanisms throughout the Bologna Process countries, also regarding the student involvement therein. Nevertheless, we are certain that there is still need for improvement. ESU strongly believes that the future of Quality Assurance should be on the policy making arena and discussed by the main stakeholders with the goal to strengthen and enhance the current QA systems and to boost their positive impact.

In the future development of quality assurance in the European Higher Education Area it is absolutely inevitable to foster both internal and external quality assurance to the same extent: internal quality assurance is the necessary basis for functioning external quality assurance, as there is nothing external QA can assure if there are no functioning internal QA systems.

This necessity stands in some tension to the fact that higher education institutions do not seem to be very keen on developing sound and holistic internal QA systems but rather only broad concepts of quality culture. ESU finds it vital that whilst a quality culture needs to be developed in every higher education institution and its sub-units there is also a need for an internal QA system including clear and stable procedures as well as accountability and control elements in order for external quality assurance to be enabled to fulfil its main target of ensuring that the higher education institutions do have in place sound and fit for purpose internal quality assurance systems.

## **Future of the European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)**

The ESG, since their adoption in 2005, have assumed the role of a key tool for the establishment of Quality Assurance systems in Europe. Nonetheless, after the experience of putting these standards and guidelines into practice, students, teaching staff, higher education institutions' governance and quality assurance agencies have realised that improvement concerning the ESG is needed, as the E4-Group found in its MAP-ESG project report.

When consulting local and national student representatives as well as students who have been involved in the external quality assurance of agencies, ESU concludes that it is time to revise the European Standards' and Guidelines. The problems detected during five years of implementation of the ESG need to be addressed in order to improve their usefulness.

### ***Purpose and scope***

Higher education in Europe has continuously been changing and developing over the last ten years. ESU strongly believes that the European framework for Quality Assurance must fulfil the purpose of supporting, enhancing and assuring quality of higher education in its entirety and thus it cannot remain unchanged whilst the insight on vital aspects of higher education quality has evolved.

Quality of higher education does not only depend on the direct impact of teaching and learning, but evolves in a complex setting, while differing from person to person, relation and situation to another. In order to facilitate a move to a more student-centred model of HE, quality assurance should take a more holistic view of interactions and conditions within higher education

institutions. Higher education institutions are unique in knowledge production because they make the link between education and research.

It is thus crucial that ESG also reflect upon key activities of the institutions impacting on HE quality, by giving a role to quality assurance in the management of research in terms of providing fruitful conditions for research and research-focused teaching, lifelong learning provision options and Bologna tools such as qualification frameworks and learning outcomes that are key to moving towards student-centred learning. Furthermore, institutional management at large should be more concerned with quality assurance, not only the teaching staff or only separated QA departments or units.

Lastly, ensuring equal opportunities is not only a matter of social justice, but also assuring and strengthening quality of Higher Education. Thus, quality assurance must play a role in enhancing the social dimension in Higher Education, understood as removing all obstacles to access, progress and completion, in that it should reflect the importance of the social dimension in quality assurance policies and the identification of quality standards and indicators on which institutions can take action while external quality assurance could check how effective they are. Furthermore it must be clearly stated that social dimension is a benefit for QA and that the recognition of social dimension in QA needs to change.

### ***Clarity and usability***

Considering that different possible interpretations of the ESG do exist as evidenced by the E4 report, the clarity of the standards and guidelines needs to be improved, as different possible interpretations can lead to completely different ways of implementation. Therefore, ESU calls to strengthen the current standards and guidelines through a further clarification.

Moreover, while ESG has clearly established next to its developmental role, the notion of a compliance tool as the basis for decisions regarding the work of agencies, ESU deems that EQAR should assume a greater role in clarifying the interpretation of the European Standards and Guidelines, as this issue would likely remain even with significant improvements being done. Likewise, ESU will welcome a clarification about the ownership of the ESG. As the adopted ESG are written in English, ESU invites the Quality Assurance Agencies in cooperation with other stakeholders, including student representatives, to provide official translation if needed.

### ***Implementation and impact***

Furthermore, although there have been clear efforts on the implementation of the ESG, there is room for considerable improvement. ESU would like to emphasise that the work on implementing the ESG in all Bologna Process countries needs to continue, especially as far as student involvement is concerned, and especially in countries that have only recently started the implementation.

### ***In General***

ESU is aware of the tension between accommodating the expectations of all relevant stakeholders in terms of the purpose and scope of the ESG and being as clear as possible in the formulation of the standards and guidelines for high usability and clear implementation. However, we see it as

indispensable to enter into a real dialogue among these stakeholders in order to successfully find solutions in consensus, as we can not accept excluding views within the E4 and the other stakeholders and deciding by majority rule.

ESU notices there are great difficulties in ensuring the ownership and support of teachers for quality assurance. It would however be of absolute necessity that exactly those concerned with teaching and thus those at the heart of the object of QA should work closely on improving the system which is designed to ensure the quality of higher education at their institution. ESU thus finds it vital to listen to the perspective of teachers much more closely and to include this perspective in the further development of the European reference point for quality assurance on both the European as well as the national and institutional level.

## **Empowering the European Quality Assurance Register (EQAR)**

EQAR that is operational since 2008 has seen a considerable number of Quality Assurance Agencies to apply for listing. However, currently only less than a half of the quality assurance agencies operating in Europe are registered. The European Students' Union reaffirms its support to EQAR and calls for strengthening the role of the register in the European Higher Education Area and welcomes the external evaluation and a number of its conclusions.

### ***Strategic role***

ESU supports an empowerment of the policy-making and strategic role of EQAR. This is especially crucial since EQAR should become a beacon for good and trustworthy external quality assurance. Thus ESU believes that EQAR should provide its expert view firstly through making public decisions about inclusion based on regular reviews of agencies and secondly by fulfilling its larger mission that refers to issues like supporting mobility and information provision.

EQAR should thus take a more active role in the longer term in organising activities like building a dialogue between its members through events and secondly by becoming useful for the end user or those that seek quality assurance information, like prospective students or policy makers. ESU thus calls upon the General Assembly of EQAR to agree on its strategic priorities and elaborate a strategic planning for the EQAR association.

### ***Transparency***

ESU strongly believes that EQAR should enhance the transparency of the Register Committee and its decision-making. ESU considers that the policy of confidentiality that has been applied to its decision-making process is no longer appropriate and it could damage the credibility and trust of the Register.

Furthermore, transparency is especially necessary in terms of knowing how the ESG, which serves the basis for decision-making, are being interpreted thus allowing for everyone to see what is considered a good practice. This however, should not lead to compliance in which the criteria and its interpretation will matter more than the meaning behind the activities.

### **Trust**

Yet, sustainable impact of the register and reaching the longer term goals of EQAR will only be possible once quality assurance agencies which are registered are also recognised in other countries by national legislation throughout the EHEA. This should lead to more external reviews and evaluations being carried agencies other than the national one in the respective country, while still respecting the national standards for quality assurance.

### **Clarity and relation to stakeholders**

ESU considers it important to draw a clear differentiation between ENQA, which is one of the stakeholder organisations among others, and EQAR, which was founded by the E4 organisations (ENQA, ESU, EUA and EURASHE) to independently operate as a Register of quality assurance agencies. This differentiation must be translated into a clear distinction of the membership of quality assurance agencies within ENQA, and the meaning of quality assurance agencies being registered on EQAR.

Although both ENQA and EQAR use the substantial compliance with the ESG as the criterion for membership and registration respectively, differences in decisions can occur because the two bodies are free to interpret 'substantial compliance with the ESG' in their own way. ESU finds it vital that EQAR makes transparent their interpretation of this term.

Furthermore, ESU finds it important that also European agencies which are not full-members of ENQA as well as non-European agencies should have a completely equal opportunity to be registered if they fulfil the registration criteria.

### **Evidenced decisions**

Partially following from the considerations above, but mostly because ESU holds that the role of EQAR can hardly be strengthened if EQAR is not given way to define its own measure of establishing evidence of whether an agency substantially complies with the ESG or not. Taking into account the specifically needed information for the EQAR registration process, ESU asks for an empowerment of EQAR to organise and conduct its own external evaluations of agencies applying for registration. Whilst it needs to be ensured this doesn't lead to a much higher workload for the agencies, it serves as an opportunity for entangling the now necessarily very closely bound processes of agencies applying for membership within ENQA and for registration on EQAR which should bring further clarification of the fact that becoming a member of ENQA and being registered are two different processes for different purposes. Further, these EQAR-organised external evaluations would be useful for non-European agencies and European agencies that are not members of ENQA.

### **Usable Register**

ESU would welcome that in a long term EQAR becomes more directly useful also for the students or prospective students through becoming an information tool providing support for study choice. This could happen by EQAR attracting end users directly to its resources or by cooperation with larger scale projects in which EQAR could play a key role in assuring that in the information age, trustworthiness would be valued.