Sub-theme: Quality and Standards – The regional perspective
Mutual Recognition: An approach to create quality assurance and international transparency for quality assurance agencies

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Abstract
The paper presents the experiences gained in the pilot project on mutual recognition conducted by the quality assurance agencies in the Nordic countries and the future perspective for international quality assurance of national quality assurance agencies. The background of the project was the need to simultaneously advance, on the one hand, internationalisation of quality assurance of higher education, and on the other hand, allow for the differences in the national approaches to quality assurance as well as the to the regulation and funding of higher education. Mutual Recognition was perceived as a way of creating international transparency while respecting the differences of the national approaches to quality assurance. The Danish Evaluation Institute and the Finish Higher Education Evaluation Council volunteered to be test cases in the project.

The paper will focus on two issues. Firstly, strength and weaknesses of the method employed and of the use of the ENQA-membership provision as a basis for the evaluative procedure. Secondly, the pros and cons of using Mutual Recognition as international evaluative procedure compared with other approaches.

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Mutual Recognition:

An approach to create quality assurance and international transparency for quality assurance agencies

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Introduction

Over the last decade, international developments in relation to higher education have created new challenges for quality assurance of higher education. [1] This is especially true in Europe where the political commitment to consolidate the European area of higher education (as stated in the Bologna Declaration) has established a political demand for the transparency of quality of higher education, in addition to the challenges created by increasing student mobility and the competition to attract students, staff and funds or, to put it more generally, by globalisation. These diverse challenges all suggest that initiatives should be taken to make quality assurance of higher education an essentially international issue. Operating from an international position, quality assurance would be better able to cope with the increasing international challenges of both a political and societal nature.

However, at the moment, quality assurance of higher education in Europe is primarily embedded in national (or regional)quality assurance agencies. This is consistent with the fact that European higher education is very diverse and regulated and financed through different national and regional schemes. This diversity is likely to reduce as a consequence of the Bologna-process, but it is unlikely to disappear. An indication of this can be noticed in the Prague Communiqué in which the ministers commit themselves to preserve diversity as an asset of higher education in Europe. [2] The coexisting need for internationalisation of quality assurance and the national embedment of higher education present a dilemma that has to be solved before the former can be advanced.

These considerations formed the background to the decision made by the quality assurance agencies in Denmark, Finland, Norway and Sweden to conduct a pilot project on mutual recognition in order to fulfil four interlinked objectives. The first objective was to assess mutual recognition as a way of *bridging the gap between internationalisation of quality assurance and national embedment of higher education*. Taking on the challenges of The Bologna-Prague process, the second objective was to investigate whether mutual recognition could *contribute to the establishment of European compatibility in quality assurance.* The third objective was to address the question intrinsic to evaluation and quality assurance: "Who guards the guards?" or, more specifically, "Who evaluates the evaluators?" - in order words to investigate whether Mutual Recognition could function as a *trustworthy system of quality assurance of national quality assurance agencies.* The fourth and final objective was to assess the possibility of linking quality assessment to en bloc recognition of a country's degrees. With regard to the fourth objective the project has shown that a direct linkage between en bloc recognition of degrees and mutual recognition is in itself a complicated issue which needs special attention and, therefore, the issue will not be further addressed in this paper.

The focus of this project has been on the methodological soundness of the evaluation procedures of the participating agencies. This implies that this kind of recognition process would result in an evaluation in country A being as methodologically sound as in country B. [3]

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[1] Campbell, Carolyn & Wende, Marijk van der: International Initiatives and Trends in Quality Assurance for European Higher Education - Exploratory Trend Report, The European Network for Quality Assurance in Higher Education, 2000.

[2] Towards the European Higher Education Area, Communiqué of the meeting of European Ministers in charge of Higher Education in Prague on May 19th 2001.

[3] There are important differences between the already established mutual recognition schemes and the mutual recognition of evaluation agencies carried out in the pilot project. One important difference is the number of functions of authority vested in the same agency. Some agencies integrate several functions, e.g. the authority of the approval of programmes/institutions, the follow up on evaluations, setting of standards and approval of foreign degrees. Other agencies solely hold the responsibility for evaluation whereas the other functions are vested with other parties.

This paper presents the experiences gained from the pilot project and discusses future perspectives for international quality assurance of national quality assurance agencies. The paper will discuss two issues. Firstly, the strengths and weaknesses of the method employed and of the use of the ENQA-membership provisions as a basis for the evaluative procedure. Secondly, the pros and cons of using Mutual Recognition as an international evaluative procedure compared with other approaches.

The paper is structured in three main sections. An introductory section that presents the method employed, followed by a section containing a discussion of the two issues mentioned above and, finally, a concluding section.

The employed method
A working group with members from the agencies in Denmark, Finland, Norway and Sweden was responsible for the project. The Danish and the Finish agencies volunteered to be reviewed as test-agencies. The working group decided on a method that comprised the following elements:

- A self-study conducted by the agencies under review on the basis of a protocol developed in the working group. The protocol focused on the purpose and ownership of the agencies, evaluation methods used and the existing quality assurance mechanisms, including compliance with ENQA membership provisions. The ENQA membership provisions thus functioned as criteria in the mutual recognition review.

- A two-day site-visit at the agency under review. The members of the working group constituted the visiting panel (except the member from the agency under review). The working group provided guidelines for the visiting panel before the visits. At the visit the review panel held separate meetings with management, staff, the board, the responsible ministry and representatives from reviewed institutions.

- The visiting panel reported the reflections from the site-visit in a written, though informal, feedback report. The report was primarily on general observations and not systematically concerned with the criteria used. This was done to avoid potential problems of not being recognised in the pilot project.

In order to highlight blind spots and potential weaknesses of the project, two experts external to both the project and the Nordic higher education environment were invited to review the method used. Professor David Dill and consultant Sami Kanaan kindly accepted the responsibility. The working group's experiences and reflections concerning the project have been published as an ENQA Occasional Paper together with the external experts' contributions and annexes.[4] The protocol and the guidelines used were revised as a result of the experts' comments and the experience gained.[5]

The strengths and weaknesses of the method employed
The project was successful, or rather promising, with regard to three of its objectives. The fulfilment of these objectives will be discussed below with attention to the strengths and weaknesses of the method employed.

Firstly, the project showed that the proposed method is promising with regard to *bridging the gap between internationalisation of quality assurance and national embedment of higher education*. It offers to provide transparency within an agreed and international framework and, at the same time, it allows for the national context to be taken into account. This is achieved on the one hand by drawing on internationally

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[4] Kristoffersen, Dorte & Lindeberg, Tobias (eds.): "A Method for Mutual Recognition: Experiences with a method for mutual recognition of quality assurance agencies", ENQA Occasional Papers, 4, European Network for Quality Assurance, 2002
[5] Manual: For quality assurance aimed at Mutual Recognition of Quality Assurance agencies. 2002 (http://www.eva.dk/publika/Notat/Manual%20to%20mutual%20recognition.pdf)

recognised criteria (derived from the ENQA membership provisions) and a methodology that is based on internationally recognisable procedures laid down in the protocol for self-study and the guidelines for the review panel. On the other hand, the criteria are solely related to the over all conduct of quality assessment. The ENQA provisions specify requirements for the agencies' independence, methodological core elements and internal quality assurance. At the same time, the provisions set aside the question of how the assessment should be conducted by mentioning evaluation, review, audit or accreditation as possible types of assessment.[6] Furthermore, issues concerning the founding and regulation of higher education are also omitted.

Secondly, by using the ENQA-membership provisions as criteria, the project also carries the possibility of *contributing to the establishment of European compatibility in quality assurance*. It should be mentioned that this objective is grounded in the Bologna declaration where the signatories commit themselves to promote European co-operation in quality assurance with a view to developing comparable criteria and methodologies.[7] The ENQA provisions can be perceived as an established point of reference for a European external quality assurance methodology. The ENQA membership provisions proved to be a well functioning point of departure in terms of establishing criteria. However, the working group came up with several modifications in the revised protocol in order to make the provisions suitable as criteria in a review process.

Thirdly, with regard *to establishing a trustworthy system of quality assurance of national quality assurance agencies* the project employed a model very similar to the model used for assessments of Higher Education (the four stage model): Independent agency; self-assessment; external panel and site visit; and a public report.[8]

The first requirement is probably the most difficult element to comply with in the four-stage model. Independence in the sense used in the ENQA provisions could probably only be achieved if an international organisation was assigned this specific task. Drawing on the lesson from the Association of European Universities (CRE, now EUA) project on accreditation, there does not seem to be an interest in such an arrangement – at least not at present.[9] An alternative way of creating independence can be identified in the Washington Accord set-up. The mutual recognition reviews conducted within this scheme cannot be said to (and are not intended to) be independent of accreditation agencies as such. However, since the procedures are established by a group of accreditation agencies, they are independent of the individual agency. This might be a path to follow - especially if it is combined with an intense and structured dialogue with university organisations.

The self-study in the mutual recognition project is similar to the self-evaluation required by the ENQA provisions. However, the protocol used for the self-study specifies that the self-study should focus on documentation and compliance with the criteria, rather than on analysis and development. As a reflection on the project it was nevertheless the opinion of the working group that the self-study should contain an analysis of strengths and weaknesses, as well as threats and opportunities. This is partly in order to force the agencies to "take their own medicine", partly because it is critical that the self-study reflects the agency's capacity to improve and adapt to new challenges. As Sami Kanaan states, "Since one of the major criteria of analysis should be the capacity of the agency to adapt to new demands and trends, and to permanently improve its action, while maintaining a solid and credible methodological framework and

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[6] ENQA: Regulations of the European Network for Quality Assurance in Higher Education, approved by the Third Network General Assembly on 27 May 2002.

[7] Joint declaration of the European Ministers of Education Convened in Bologna on the 19th of June 1999

[8] ENQA: Regulations of the European Network for Quality Assurance in Higher Education, approved by the Third Network General Assembly on 27 May 2002; provision 3.4.

[9] Towards Accreditation Schemes for Higher Education in Europe?, CRE project, July 2000 - May 2001 co-funded by SOCRATES programme (Complementary measures for Higher Education), "Conclusions" from the Validation seminar, 8 - 9 February 2001, Universidade Técnica de Lisboa, Oeiras, 2001.

governance model, the agencies should be required to perform a SWOT analysis, or anything similar, as well as to formulate their strategies of change and development."[10]

Another key element in both the Mutual recognition review and in the ENQA methodological provision is the external panel and site-visit. In terms of building a trustworthy system of quality assurance of national quality assurance agencies it is essential that the expertise and the independence of the experts is indisputable. Concerning the experts' independence, it is recommended by the working group that the task of appointing the experts be given to a third party. This third party could be ENQA, EAU or an agency not involved in the process. Concerning the panel's expertise, the working group recommends the following three expert profiles (possibly supplemented by a secretary): staff from agencies other than those involved; a representative from the higher education institutions which have been reviewed by the agency; and an expert with knowledge and experience of evaluation from both a practical and theoretical perspective.[11]

With regard to the ENQA requirement of a public report it was decided not to draft a report due to the uncertain character of the project. However, in a future scheme of Mutual Recognition, a public report on compliance with all criteria must be regarded as essential in order to create credible quality assurance.

If a scheme of mutual recognition is to be implemented, the organisation of the scheme is also important. The project identified four possible scenarios for establishing a scheme. The scenarios build on the following two factors: (i) either bilateral or multilateral cooperation in terms of the methodological framework; (ii) bilateral or multilateral decision-making in terms of the mutual recognition decision. This implies that the organisational possibilities range from purely bilateral agreements to a global scheme of mutual recognition. The project showed that the organisational possibilities merit serious consideration to ensure a workable and not too bureaucratic system that is flexible in terms of improvements and the methods applied.

The effectiveness of other meta-evaluative procedures to meet the objectives
The pilot project has shown that mutual recognition might be a way of addressing some of the most important issues of quality assurance of higher education today. However, this does not imply that mutual recognition is the optimal way of addressing these problems. There might be at least two reasons to consider other alternatives. First of all, no mutual recognition framework can be stronger than its weakest member. This in turn means that the credibility of the framework can never be stronger than the credibility of its weakest link, as indeed a group of certification organisations within sustainable forestry has remarked.[12] This implies that mutual recognition can be expected to have a tendency to be exclusive in order to preserve the trustworthiness and prestige of the scheme. It might be argued that a scheme based on exclusion is not what is needed in Europe at a time when there is both a political desire for a European dimension in quality assurance and significant variation in the design and rigidity of national quality assurance schemes in Europe. Secondly, when mutual recognition has proved difficult to achieve in terms of recognition of degrees, the apparent benefit of the particular mutual recognition approach for some of the most important stakeholders, such as students, graduates and employers, diminishes. These stakeholders can be considered to be the end users of quality assurance and, thus, of mutual recognition.

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[10] Kanaan, Sami: *A Method for Mutual Recognition – External comment on a project of the Nordic Quality Assurance Agencies; in* Kristoffersen, Dorte & Lindeberg, Tobias (eds.): "A Method for Mutual Recognition: Experiences with a method for mutual recognition of quality assurance agencies", ENQA Occasional Papers; 4, European Network for Quality Assurance, 2002 - p. 34.

[11] If the purpose is bilateral mutual recognition staff from the recognising agency should supplement these experts.

[12] Sustainable Forestry & Certification Watch, "Forest Certification and Mutual Recognition: The Fundamentals", 2001 (http://www.sfcw.org/mutualrecognition/forest_certification_and_mutual_.htm)

Having taken the above perspectives into consideration, the last part of this paper will present and discuss some alternative approaches (other than Mutual Recognition) to meet the objectives of the pilot project:

- To bridge the gap between internationalisation of quality assurance and national embedment of higher education.
- To contribute to the establishment of European compatibility in quality assurance.
- To establish a trustworthy system for the quality assurance of national quality assurance agencies.

Mutual Recognition is not the only meta-quality assurance model that might serve the purposes of the pilot project on mutual recognition. At least three other options are available, and the characteristics of these meta-evaluations can be defined and discussed individually.

One rather uncomplicated option (in terms of setting up) is international ad hoc evaluation, such as the ones carried out on the Hungarian Accreditation Committee and the Danish Evaluation Institute.[13] In the Danish case, the evaluation was conducted by three independent researchers commissioned by the Ministry of Education. In the Hungarian case, a larger team of experts under the responsibility of the CRE conducted the evaluation.

Another option is to use already existing schemes for external quality assurance such as certification within the ISO 9000 scheme, e.g., the Agency for Quality Assurance in the Catalan University System.[14] This would provide a well-known general framework for all interested agencies. The ISO 9000 system verifies that certain procedures are followed by the agency.

A third option would be to design a meta-evaluation scheme especially for a European context. Such a scheme could be based on – or affiliated with – ENQA and have the purpose of enhancing and assuring agency compliance with the ENQA membership provisions.

Concerning the advantages and disadvantages of these different approaches with regard to the objectives of the pilot project on mutual recognition, the following points can be made:

- All the models may to some extent contribute to bridging the gap between internationalisation of quality assurance and national embedment of higher education. As mentioned above, a key element in solving this dilemma is to focus on general issues of quality assurance. This element, while necessary, is not enough to solve the dilemma. In order to achieve internationalisation of quality assurance, the procedures used to create internationalisation must be transparent and easy to disseminate. This implies a possible trade-off. On the one hand, ad hoc evaluations are more adaptable to the national context than permanent schemes. On the other hand, permanent schemes are likely to be more easily explained in an international context than ad hoc systems. This is because permanent schemes can be made generally known, whereas an ad hoc based system must be comprehended in the context of the individual case.

- With regard to evaluation of compliance with ENQA membership provisions, there are differences in the above-mentioned models. Ad hoc meta-evaluation might or might not be linked to the ENQA membership provisions. ISO 9000 is not directly linked to the provisions, whereas both the pilot project on mutual recognition and a possible meta-evaluation scheme specific for a European context could be linked to the ENQA member ship provisions.

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[13] "The External Evaluation of the Hungarian Accreditation Committee", Hungarian Accreditation Committee Budapest, 2000 and Thune, Christian & Kristoffersen, Dorte: "Guarding the guardian: The evaluation of the Danish Centre for Quality Assurance and Evaluation of Higher Education", paper presented at the 5th biannual conference of INQAAHE, Santiago de Chile, May 1999.

[14] Dalmau, Gemma Rauret & Soca Maria Giné: The Internal Quality System of the Agència per a la Qualitat del Sistema Universitari a Catalunye, INQAAHE-2001, Conference on Quality, Standard and Recognition

- All models can contribute to establishing a trustworthy system for quality assurance of quality assurance agencies. Trustworthiness relates partly to the rigour of the method applied and partly to the ownership of the procedures and the appointment of experts. The latter might suggest that Mutual Recognition could be considered a bit of a "closed shop" when agencies themselves are responsible for the framework.

Final remarks

This paper has strived to illustrate that it is both possible and worthwhile to meet the challenges associated with internationalisation of quality assurance, even though its acceptance is hindered by national embedment of higher education. The paper has also illustrated that Mutual Recognition is a possible, and to some extent promising way of addressing these issues. However, the paper has also illustrated that the type of meta-evaluation most required in Europe is not necessarily based on mutual recognition. There does actually seem to be a case for continuing the work with less rigid focus on recognition. The findings of the project, including the manual with the revised protocol for self-study and the revised guidelines for the review panel[15], could form the basis of a new project with the double aim of constructing a scheme for reviewing and enhancing compliance with, for example, ENQA membership provisions.

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[15] The Nordic Working Group on Mutual Recognition: "Manual: For quality assurance aimed at Mutual Recognition of Quality Assurance agencies", 2002 (http://www.eva.dk/publika/Notat/Manual%20to%20mutual%20recognition.pdf).

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