Report of the Scientific Council to A3ES.

Meeting of December 7th – 8th 2009.

The Scientific Council submits herewith its first report to A3ES. We are grateful indeed to colleagues and staff members of A3ES both for their candour and for the forthright way in which they dealt with the issues our questioning posed them. We have learnt much and would hope that these reflections and comments may in turn help A3ES to move rapidly, efficiently and successfully towards fulfilling a remit that is both bold and challenging.

Our considered views fall into two headings: Commendations and Recommendations. The first sets out what we consider to be foremost amongst the features that characterise A3ES, its remit and the strategy it is putting in place to execute that remit. The second may be seen as a series of points that we believe to be germane to carrying out successfully the task with which A3ES has been entrusted. By raising them, we are persuaded that A3ES has, in varying degrees, anticipated them. If this is so, then by raising them again, we merely confirm the Agency's diagnosis of its own state of readiness and the *bien fondé* of the strategies it has adopted. In the rarer instances where our views raise issues not immediately in the forefront of the Agency's planning, the points we raise are presented in a spirit that is constructive rather than critical.

Commendations.

Amongst the initiatives already visible in the work programme under way since January 2009, is the implanting of Information Technology as a central feature to the overall task of evaluation and accreditation. Information Technologies are thus the major instrument for gathering, monitoring and tracking information essential for carrying out, efficiently and expeditively, the first phase in the Agency's Activity Programme over the coming two years. Not only is A3ES pioneering in the extent to which it employs this technology. The goals the Agency has set itself for the first two years of operation are, it seems to us, possible only on condition of extensively employing this technology, which also ensures a "lean organization".

To the best of our belief, no other Evaluation Agency in Western Europe has applied Information Technology to the process of evaluation and accreditation to so marked a degree. This is an innovative approach to accreditation.

The strategy of pre-accrediting existing programmes by selective review is not less innovative. The specification of relevant performance indicators and the use of "desk evaluations" as a means to separate those cases that require deeper analysis from those that clearly achieve minimal standards, will permit the Agency to best implement over time a valid and respected accreditation regime, while limiting the disruption to students and to the higher education system.

Clearly, A3ES is building upon experience accumulated earlier and by parallel agencies outside Portugal. It is, in short, starting off from a point that others have reached only after a build up of five or ten years experience.

Speeding up the "administrative treatment" of applications for accreditation, the assignment of a 90 working day "turn around" period as a target for completing the application process is a public gauge of ambition. It is also a clear commitment to self-imposed efficiency. Equally significant, in our opinion, has been the care taken in the recruitment, selection and training of the Agency's staff. Training in higher education law, formal induction into the tasks the Agency's younger cadres are to undertake is appropriate and admirable. Such training is best characterised as bi modal that is, it is undertaken by both the Agency and by institutions of higher education. The younger cadres have responsibility both for briefing HEIs on the purpose and technicalities required by the Agency, whilst acting as a reverse channel of communication between individual department and Agency. Theirs is that vital two way flow of information, a function that, if important during the start-up phrase will, we feel, become of increasing centrality once the Agency's agenda moves on from operationalizing, identifying and assessing quality at the institutional level to the no less challenging task of adjusting and sustaining a culture of quality at that level. This latter aspect remains central if individual institutions are to have sufficient information – and confidence – to plan their own initiatives in this domain.

The potential significance of the Agency's younger cadres is immense. Their work in briefing – the first step in embedding a "quality culture" as a national engagement expressed in each HEI – allows feedback from institution to Agency. It is no less important in demonstrating that the Agency listens to its "clients". In effect, the younger cadres furnish the base on which trust may mature into confidence, into a sense of reciprocity between Agency and institution in the joint task of embedding quality and, equally relevant, in setting down clearly the boundaries of responsibility between the two partner bodies. Quality culture if it is clearly seen to be the "possession" of the Academic Estate, is not, in our experience, entirely immune from the possibility of degenerating into bureaucratic formalism. We are then, heartened by the Agency's sensitivity and alertness to the basic issue that what matters in "embedding" quality culture into the individual university or Polytechnic is less the presence of procedure so much as the quality of the relationship that subsequently grows up between the Academic Estate, the Administrative Estate and the national Agency.

We would wish to commend the decision of the Government to confer the essential principle of independence on A3ES. It is clear to us that the lessons of an earlier phase in the development of the Evaluative State in Portugal have been well learnt and, no less important, have been retained and acted upon.

Finally, we would be remiss indeed if we did not express our admiration for the basic strategy A3ES has adopted for the first two years of its Activity Plan. It is a strategy that combines the rigour of procedures, clarified and operationalized on the basis set out by the legislator in the Higher Education Guideline Law of August 2007. It is in the positive meaning of that term "expeditious" whilst being both focused and realistic. Unlike the cadence we have seen in other similar Agencies elsewhere in Europe, which built up momentum over a number of years, A3ES has clearly opted for a strategy, which means, in effect, "it has to hit the road, running." Such a strategy is bold, imaginative and thoroughly in keeping with the demands that government and society in Portugal are placing on the Nation's system of higher education.

Recommendations.

We now turn our attention to Recommendations, but Recommendations to be understood not as radical departures from what the Agency is currently engaged upon developing so much as refinements to issues already tackled and envisaged.

The first of these bears upon the issue of training and induction as part of the overall process of "embedding" quality culture solidly within the individual establishment of higher education. We feel there is advantage to be had in placing rather more weight upon two domains in particular – student learning and the conditions under which it is enhanced and optimised. There is a very considerable research literature on this. It is, however, rarely employed as part of assessing the infrastructure and provision that the review process sets out to evaluate. Quality assessment tends to focus on structure and provision rather than, for instance, on process and learning outcomes. One suggestion that occurs to us would call for some preliminary investigation to be carried out by the Agency's Analysis Unit into the organizational arrangements that accompany the optimization of student learning as a way of injecting empirical evidence into this issue.

The second recommendation may be seen as an extension of the same perspective. Is there such a thing as a "minimum information basis" which allows the issue of quality-based policy to be pursued at institutional level? The more universities and polytechnics become masters in their own house or are called upon publicly to demonstrate they fulfil public expectations, the more information and very often a different type of information is required if they are to demonstrate clearly that they have not "left undone those things that ought to be done." A relevant minimum information base, focused on HEIs performing their role in society ought, we felt, to include such information as where graduates "end up", retention rates, the jobs they take up, salary level.

The list is, of course, not complete. Even so, the fact remains that in systems where a high degree of institutional autonomy is the norm, elements such as these form the basis of what is termed "institutional research" – that is, in essence, self-knowledge about what the individual establishment has achieved.

Some systems, notably the English, have developed elaborate procedures that take this aspect into account. The English procedure draws upon Teaching Quality Information, which is included in the quality assurance framework of the Higher Education Funding Council for England. (HEFCE). Teaching Quality Information brings together information from a number of statistical sources, amongst which the National Student Survey, the Destination of Leavers of Higher Education as well as items derived from the Independent Learner Record. Others, Australia for example, employ a national questionnaire, drawn up by government but administered by the individual establishment.
We mention these two instances simply as illustration of how different types of data source, already operant, can be made to strengthen "institutional" self- knowledge. We are not, however, arguing that these two examples necessarily provide templates for application to higher education in Portugal.

Self-evidently, this topic merits closer attention, not least whether the information is available elsewhere in the national statistical apparatus. We would urge that attention be paid to it, possibly by commissioning the Analysis Unit to undertake a study first to locate where such information, assuming it is regularly gathered, is available, in what form and how it may serve to improve the quality of service in those HEIs that originally provide it. A subsection

of the same analysis would, we believe, be particularly relevant in tracking down recent and current initiatives other systems of higher education have undertaken in Western Europe.

The third aspect that attracted our attention turned around the general issue of "embedding" quality culture at institutional level. Whilst this process is largely and rightly a matter for the individual HEI and to that extent both an internal and a technical matter, it is also the *conditio sine qua non* for the success of A3ES's strategy and its overall mission. We note that the Activity Plan intends to open up and make A3ES's training scheme available to participants from HEIs. We applaud this and not just on grounds that it is central to sustaining a working consensus around the technical dimension, but also because shared training is, it seems to us, essential in shaping the "Quality" of the relationships "quality culture" must rely on if it is to rest on trust and to demonstrate mutual confidence.

From this latter perspective, extending the training internal to A3ES to members of the Academic and Administrative Estates at institutional level has the potential to act as a second two-way "confidence channel". On this, we have already expressed our views in connexion with the future role A3ES's younger cadres will come to play. Training extended to HEIs is then a second dimension to the crucial task of "creating a spirit of reciprocity and mutual confidence."

As the training programme moves on from the immediate task of how to deal with the platform, so it will assume greater weight especially in the training and briefing of potential external reviewers. Whilst the latter is a necessary and always a delicate task, it strikes us that the sheer dynamics involved in A3ES's launch strategy deserve special attention. In this connexion, our view is that though training subject specialists in the basics of external review is indispensable, it is not enough. It is not enough, we believe, because subject specialists *on their own* may well turn out to be an element of constraint in an operational system the salient feature of which is its speed of operation and adaptation. The training should extend towards inculcating at least part of the members of the evaluation team with a process and evaluation perspective. Our view on this is less operational than stated as an observation.

One of the features key to the successful negotiation and embedding of "Quality Culture" at institutional level entails the capacity to identify and verify information relevant to academic quality in addition to the usual demands placed on subject specialists. The readiness to consider alternative arrangements and the information for their analysis, observation and question skills appropriate to this task needs to be incorporated into training. One possible opening to this approach would be to examine how other quality assessment agencies in higher education undertake training and observation in monitoring the activities for which they have oversight and how they go about taking such new and/or alternative information items into account of their accreditors/evaluators and incorporating their best practices into the process and procedures of A3ES

It is our experience that elsewhere relatively little attention is paid to the impact on the general workload accreditation procedures so often demand. Yet, it is precisely this aspect which, for better or for worse, has direct bearing on the "quality" of the "quality relationship" and how it is perceived by those involved in it, whether as an opportunity for demonstrating achievement, obtaining recognition or whether it is deemed a burden and a deflection from the general engagement to teaching, learning and research. Though we do not hold this aspect to be a matter of pressing priority, it is, given the sensitivity A3ES constantly displays

in its documents to "embedding quality culture", a matter which, we feel, ought not to be subject to benign neglect, still less taken for granted.

Towering workloads exhaust enthusiasm, sap morale, reduce the demonstration of quality, and marginalize these central features of advanced learning, by reducing that task all too often to the status of drudgery reluctantly born.

One final issue caught our attention in the general area of training and "embedding a quality culture." The intention of A3ES to stress this element, we applaud. But intention does not always imply capacity. And we put it to ourselves whether, given the focused "launch strategy" during the first two years, such a commitment to the training aspect might not place undue strain on the primary objectives of examining the status and quality of between 10 and 15% of programmes now in place which require this scrutiny. In raising this issue, we do not deny − far from it − the importance training has for both technical execution and for putting the relationship between evaluators and evaluated on a creative and positive footing.

It occurs to us, that one possible solution to priorities of equal significance lies in the timing. And that extending training to HEIs might better be accommodated as a major objective of the Second Phase of A3ES's development, after the initial two year review and accreditation process has been completed.

A3ES's first two years are, as we have already had cause to note, ambitious, expeditive and highly dynamic. The platform drives forward from the stipulations set out in the Higher Education Guideline Law of August 2007, which clearly acts as the driver to the contents contained in the platform. If the experience of other Evaluatory and Accreditation Agencies in Western Europe is anything to go by, the first evaluatory round ought to provide pointers as to which of the many items included in the platform possess particular sensitivity and discriminatory power and which, on that account, may prove more appropriate for the task in hand and, by the same token, those that have less. In short, the experience of the first round ought to show how far the Agency possesses further degrees of freedom in interpreting which amongst the many dimensions the platform has operationalized on the basis of the Guideline Law best bear continuation and those which, because less discriminating or devoid of discriminatory power, may be dispensed with.

In their better forms, assessment and accreditation are exercises in that classic Greek exhortation "know thyself". It is clear to us that A3ES, by the end of the first two-year period, will have gathered much material that is useful for the further refinement of its objectives and procedures. This form of learning will almost certainly not be confined to the Agency. Indeed, the Agency will do itself no small service by encouraging the institutional units to do the same thing and to exchange experience with them at regular intervals. It occurs to us also that this self-learning exercise would be useful indeed if applied to examining the efficiency over time of the platform itself, with the precise purpose not simply to ascertain which indicators or informational items are sensitive and merit being retained, but also those that are not and may, for that reason, be discarded. The Analysis Unit, we suggest, might undertake this exercise.

"*L'argent*, the Emperor Napoleon once remarked, ' *c'est le nerf de la guerre*." Cicero agreed with him. So it is for teaching, research and, not least, their assessment. How money is assigned, by whom to whom is often taken to be a gauge of authentic independence over and beyond formal statutory status. We note that the decision to set in place a Fiscal Council has

finally been taken. We welcome this development. It shows without peradventure that the Agency's statutory independence is now underpinned by a similar degree of independence in the resources it draws upon.

We understand that resources assigned by the Ministry have financed the "start up phase". We also understand that the method of supporting the Agency's operations will take the form of payment for services it renders in accrediting individual programmes, and that this will come from the individual HEI concerned. There is much to be said in favour of such an arrangement. However, it is not necessarily without challenge. Elsewhere, and in the United States in particular, the fact that regional Accreditation Boards are financed by those they accredit has been subject to considerable misgiving precisely on the grounds that such Boards are indeed financially dependent on those they assess.

There is, in short, an apparent conflict of interest, which cannot definitely, or wholly be dismissed. In the case of A3ES, for such a potential situation to exist at the outset is, in our view, neither desirable nor wise as a matter of principle. It is no less unwise if it should mean that the Agency cannot be ensured of financial stability once it has completed its two-year Activity Plan. When the success of the Agency's strategy is closely tied in with its speed of operation and efficiency, the absence of predictable resources holds both the impact and the successful outcome of its "launch strategy" in hostage.

Though our exchanges on this aspect did not draw on either depth or detail, we are of the view that a "dual mode" financial model would be more robust, given the complexity and delicacy of the Agency's mandate. And whilst we are agreed that HEIs ought to contribute as a real and concrete statement of their ownership of, and responsibility for, Quality in higher learning, the independence of the Agency ought not to be compromised by having HEIs as its sole source of funding. A second funding stream from Government would seem to us to uphold that balance of independence by offsetting the specific and particular interests of individual universities and polytechnics against the more general interests of the Nation, which sustains them.

These are the considered views of your Scientific Committee and we lay them before you for your earnest consideration. We would also wish to take the opportunity, once again, to thank the members of A3ES's Administrative Council, cadres and officers for the confidence they placed in us by asking that we undertake such a frank and forthright scrutiny of their achievements to date.

We remain,
Yours truly,

David Dill,
Emeritus Professor.
University of North Carolina at Chapel Hill, USA

Mary Henkel,
Professor Associate,
Brunel University, Uxbridge, UK.

Guy Neave,
Emeritus Professor,

St Germain en Laye,
France.

Don Westerheijden,
Senior Research Fellow,
CHEPS,
Universiteit Twente, NL.