

2nd Report of the Scientific Council to A3ES

Meeting of 2nd of February 2011

The Scientific Council hereby submits its second report to A3ES. Once again, we are grateful for the hospitality and engagement that met us at A3ES, and for the detailed discussions on the activities and challenges facing the agency. We see the repeated invitation to join in the discussions as a sincere attempt to bring about change and improvement in higher education in Portugal, and are honoured to take part in this process.

Our report follows the outline of last year's report. First, we would like to acknowledge the activities of A3ES that we think are very promising and relevant for higher education in Portugal. Second, we allow ourselves to bring to the table a number of issues and suggestions which we hope can provide inspiration and reflection within A3ES. We make these recommendations in the knowledge that we as foreigners may have an insufficient understanding of the many factors that may hinder or stimulate the improvement of the sector, and that quality improvement – in essence – is a responsibility of those closest to the action.

Commendations

Although the agency is very young, we already notice a spirit of engagement and entrepreneurship within it. One sign of such engagement is the swift and efficient way in which the agency has dealt with a great deal of work - measured in the number of accreditations undertaken. (More than 4,000 study programmes in all three cycles have been accredited in two years' time.) There is good reason to think that a key factor here is the technology-based accreditation platform, an innovation we commended in our last report, which seems to be continuing to provide added-value to the whole system. However, while technology certainly might play a central role, the influence of what seems to be a very thoughtfully selected cadre of staff, combining academic and administrative competence with a wealth of experience of the sector itself, should not be underestimated. That such competence is complemented by further training – often in close collaboration with staff from higher education institutions – is highly commendable. In sum, what has been created is an agency with capability, competence and, along with these qualities, sensitivity and adaptability, grounded in understanding of the higher education system.

Moving to a closely related theme, we admire and would like to give further encouragement to the reflective and research-driven approach of the agency, with respect to gaining knowledge of how the new system of quality assurance in higher education in Portugal is received within the sector. This curiosity-driven approach is not the most typical characteristic of quality assurance agencies in Europe, and demonstrates A3ES's readiness to take advantage of the opportunities for learning from experience both within and beyond its borders.

Building support for and involvement in the decisions facing the agency is one of the central conditions for developing a successful agency, and the systematic surveillance

by the staff of trends in QA in Europe provides a good knowledge base for any decisions taken. An example of this is the current study undertaken by Machado dos Santos on audit procedures in Europe. The Scientific Council believes that surveillance of this kind can also be considered as a vital part of a well-functioning internal quality assurance system; systematic interest in what happens in the rest of Europe is perhaps one of the key drivers for more reflective practices, and for constantly questioning existing procedures and processes.

We have seen further evidence of the agency's commitment to building trust and support in the sector in the number of conferences, seminars and also meetings with individual institutions they have held throughout Portugal.

The dual approach to the establishment of trust through systematic analysis and research and close engagement with the sector, (already commented upon in the Scientific Council's first report) has been sustained and seems already to be bearing fruit and to have been of value to A3ES in meeting the challenge presented by the preliminary accreditation process. We have learned how it successfully, and deftly, managed to accommodate the existing standards and rules in a way that allowed for the closure of a significant number of programmes with little or no chance of meeting the requisite quality standards, without recourse to formal accreditation procedures that might have been both costly and painful.

A3ES now is considering adopting an audit procedure as an alternative/complementary method to accreditation. This has much to recommend it, not least in the light of European lessons of diminishing returns when evaluation methods become too standardised and routinised. Since the higher education system in Portugal is highly diversified and includes some institutions that have already established systems for internal quality assurance, installing a more flexible and user-oriented system that takes this into account, is commendable. We also think a more experimental approach to audit is a good idea, although such a step does require some thoughts on the contextual factors influencing the success of such an approach. Hence, in the next section we give some recommendations and reflections as to how this might be implemented.

Recommendations

This section lays out some more detailed reflections, and some recommendations as to how A3ES may develop further activities in relation to the planned audit piloting project. Some other minor issues are also addressed in the end of the section.

The challenging relationship between quality audits and quality culture

The Scientific Council noticed that much mention was made in our discussions and in the A3ES documents of developing a "quality culture" in Portuguese higher education institutions. The ambition of encouraging a commitment to quality in all activities of higher education institutions through external audits is admirable. However, we wonder whether the initial scope of the new audit approach is perhaps unrealistically broad. New national policies in Portugal on research evaluation/funding and on the use of performance-based contracts are likely to create powerful incentives for improving a number of institutional processes of interest, including research

management. Yet, given the increasing adoption among EU countries of higher education policies emphasising research productivity, university rankings, bibliometric measures, economic development etc., most countries are discovering that the greatest challenge is how to create effective incentives for the assurance and improvement of academic standards in degree programmes. A key question is therefore how to develop a robust culture of quality in teaching and student learning at all three degree levels within higher education institutions.

A strong case may be argued for teaching and student learning to be the primary focus within an audit process geared towards developing a quality culture. Such a focus would also be more consistent with the shift from a systematic review of all degree programmes to a “lighter touch” audit regime, since to do so responsibly will require evidence that higher education institutions have in place effective processes for assuring the academic standards of their academic programmes.

Going beyond institutional QA-systems based on “student satisfaction surveys”

Strengthening institutional processes for evaluating and improving the quality of teaching is a critical priority in most EU countries. As in other countries, so in Portugal the most commonly reported QA procedure is “student satisfaction surveys.”

² However, while the adoption and use of student surveys of instruction can contribute to improving instruction, they have their limitations. Research suggests that student ratings of teachers may be affected by students’ conventional views of what constitutes good teaching, by class size and by grading/marking leniency (thus encouraging grade inflation/compression and the decline of academic standards).³ From a conceptual perspective, moreover, student satisfaction surveys measure short term satisfaction with teaching rather than long term satisfaction with learning. Over time the ritualistic employment of such surveys may paradoxically lead to less attention being paid to improving teaching and student learning. In our view, A3ES has much to gain from experimenting with external reviews that do not highlight a single mechanism for evaluating teaching, but rather encourage higher education institutions, as in the process of research itself, continually to seek more valid, reliable and effective means of assessing and improving education, by including mechanisms such as peer evaluations of teaching, external reviews of course syllabi, validation of student assessments plus student and alumni interviews etc..

Assessing Learning Outcomes and Improving Student Learning

Improving instruction is important, of that we are convinced. Yet, the ultimate social benefits of higher education are what students actually learn from their academic programmes. Learning outcomes increasingly figure in Europe-wide developments in higher education. For this reason, some subject assessments and accreditations as well as academic audit procedures have been criticised for focusing insufficiently on the improvement of student learning and/or failing to provide incentives for higher education institutions and programmes to develop effective measures of learning outcomes. When improving its subject accreditation reviews and developing the

² Fonseca, M. (2011) Higher Education Accreditation in Portugal: Year Zero 2010. Paper presented at the Third International RESUP Conference: Reforming Higher Education and Research, Sciences Po – Paris, 29 January.

³ McKeachie, W. J. (1997) Student ratings: The validity of use. *American Psychologist*, 52(11):1218-1225.

academic audit process it envisages, A3ES may wish to study the methods particularly of those subject accreditation agencies that have achieved a firm track record for focusing their criteria and reviews successfully on student learning and on the assessment of learning outcomes. Among them, it may care to note the accreditation process of the Teacher Education Accreditation Council (TEAC) in the USA, the accreditation and quality processes of the General Medical Council in the UK, and the ABET international accreditation process in applied science, computing, engineering, and technology.⁴ These external reviews all appear strongly to emphasise a culture of evidence-based decision-making within institutions directly applied to the improvement of teaching, student learning and academic programmes. Accordingly they place much weight on assessing the validity and reliability of institutional measures and mechanisms to ensure the quality of teaching and student learning. Given the research strength A3ES marshals, one project that might be envisaged in the year ahead is to investigate in depth how higher education institutions interpret – and what they understand by – “learning outcomes”, and, further, how such representations relate to broader objectives that concern both qualification frameworks and internal quality assurance systems.

Design options within an audit approach

The Scientific Council applauds the initiative to develop an audit approach in the higher education system in Portugal. The recent A3ES exercise of benchmarking internal quality assurance processes is for this reason a valuable contribution.⁵ However, while a number of studies suggest that subject-oriented external quality assurance is able to provide incentives for improving academic quality⁶, the evidence supporting the benefits of a comprehensive academic audit process as it is outlined on pages 98-102 of the Machado dos Santos report (2011) is perhaps less clear.

Given that an audit approach ought to be designed to take full account of the needs of higher education and the diverse institutional landscape in Portugal, we would suggest that A3ES consider the “frame of reference for internal quality assurance systems” (Machado dos Santos, 2011: 8.1.1) as working hypotheses for the development of an academic audit process. A3ES may wish to think about some pilot testing with a sample of Portuguese institutions as a way to experiment with a preliminary model of academic audit. This would provide an opportunity to evaluate the results of these “pilot” tests and make the necessary adjustments to the audit

⁴ E. El-Khawass, The Teacher Education Accreditation Council (TEAC) in the USA (pp., 37-54) and L. Harvey, The Accreditation and Quality Processes of the General Medical Council in the UK (pp. 249-274). In Dill, D. D. and Beerkens, M., *Public Policy for Academic Quality: Analyses of Innovative Policy Instruments*. Dordrecht, The Netherlands: Springer, 2010.

[Prados, J. W.](#), [Peterson, G. D.](#), [Lattuca, L. R.](#) (2005) Quality Assurance of Engineering Education through Accreditation: The Impact of Engineering Criteria 2000 and Its Global Influence, [Journal of Engineering Education](#), 94(1): 165-184.

Volkwein, J., Lattuca, L. R., Harper, B. J., and Domingo, R. J. (2007) Professional Accreditation On Student Experiences And Learning Outcomes, *Research in Higher Education*, 48(2): 251-282.

⁵ Machado dos Santos, S. (2011) *Comparative analysis of European processes for assessment and certification of internal quality assurance systems*, A3ES.

⁶ See for example: Dill, D. D. and Beerkens, M., *Public Policy for Academic Quality: Analyses of Innovative Policy Instruments*. Dordrecht, The Netherlands: Springer, 2010.

model before fully implementing the audit procedure. An organically developed model of academic audit which is appropriate to the specific needs of Portuguese higher education and *informed* rather than *determined* by the experience of other systems, is, we believe, most likely to lead on to an audit procedure that is successful and useful.

Considerable weight should, we suggest, be placed on the focus of the audit process. The proposed frame of reference, as we have had cause to note, is highly comprehensive. To put in place mechanisms for each of the 10 references runs, however, the risk of distracting institutions from the basic task of developing and strengthening the core QA processes which are necessary if the academic standards of their study programmes are to be assured. Whilst we take the view that the 10 References are indeed valid indicators and highly relevant in a longer term perspective, A3ES may even so wish to consider setting priorities within these 10 References and introducing them stepwise and incrementally into the audit process rather than including them all from the outset. Thus, for instance, the first wave of audits might focus on References 2&3, which are most closely associated with assuring the quality of study programmes. Later audits might then successively add further References as planned.

Such a way of implementing the audit approach is, we believe, consistent with A3ES' commitment to the principle that the higher education institutions are themselves responsible for assuring the quality of their own academic programmes, a stance we support strongly. This implies, however, that institutions have certain processes to assure academic quality already in place. Hence, the major task is one of quality enhancement, to support institutions in strengthening and making existing processes for assuring the academic quality of study programmes more rigorous and more effective. The Scientific Council notes that over 48% of Portuguese institutions report having no internal quality assurance system. However, over 70% say they have mechanisms for assessing teaching and learning, monitoring teaching, assessing study programmes, assessing teachers, and student surveys (Fonseca, 2011). This suggests some disagreement or at least a degree of uncertainty in Portugal as to what the term "internal quality assurance system" means. To avoid creating an overweening "quality bureaucracy" and a no less undesirable "culture of compliance," we would suggest A3ES consider concentrating on a review of processes already common to, and well understood by, all or almost all of its institutions, when designing its academic audit procedure.

A useful example of an audit process focused on assuring academic standards in study programmes is the system of quality audit developed by the Quality Assurance Council (QAC) of Hong Kong.⁷ Since the main objective of the Hong Kong audits is to ensure the quality of student learning, they focus on several processes higher education establishments already have in place. Amongst them: processes of programme development and approval; programme monitoring and review; curriculum design; programme delivery, including resources, teaching mode, and student learning; assessment; teaching quality and staff development. Auditors evaluate these processes at the institutional level. They then confirm the degree of

⁷ See *Audit Manual*, Hong Kong Quality Assurance Council:
<http://www.ugc.edu.hk/eng/doc/qac/publication/auditmanual.pdf>

effectiveness by assessing influence and impact on the quality of teaching and student learning in a sample of study programmes within each institution.

Some minor points bearing on the administration of, and activities within, A3ES

In the course of our discussions, the Scientific Council learned that some institutions misunderstood how the appeals process worked. While we are well aware of the close attention A3ES is paying to this issue, we would strongly recommend that the legal framework of the appeals process be clarified or revised, if only to rule out the possibility that higher education institutions perceive it as an opportunity to secure rapid re-accreditation.

Follow-up of evaluations already carried out has been a challenge to many quality assurance agencies in Europe. Since A3ES is currently considering the introduction of an audit approach a major question follows. It is this: how is the agency to follow up such audits? So long as the audits have not been activated, this issue is not of pressing immediacy. Even so, we think it wise to begin weighing up ways and means by which the impacts an audit may have on higher education may be optimised.

Despite its currently limited capacity for disseminating, diffusing and bringing its activities to the attention of the public, A3ES ought not to underestimate the degree of interest the public might have in its work. Both the research the agency carries out, and the results its activities achieve are key to its public standing. They are also of great promise in raising public awareness and interest in the nation's system of higher education to a higher level.

The Scientific Council was informed that A3ES will start to monitor how higher education institutions are fulfilling their performance contracts. This activity has the welcome potential of providing the Agency with a more stable financial base. It is commendable on that account. However, the Council is concerned lest monitoring activity such as this give rise to tensions as to the exact role the Agency plays in the Portuguese higher education system. The Council is of the view that extreme care to maintain the Agency's independence—vis-à-vis both the Ministry and higher education institutions—is a matter requiring constant vigilance as the prime condition of its role as “honest broker”.

These are our collective views and conclusions. We submit them to you for your earnest consideration. In doing so, we wish once again to express our heartiest appreciation for the spirit of openness, commitment and firm resolution for the future in which the Secretary General of A3ES and his colleagues engaged in discussion with us.

We remain

Yours truly

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