

Response to the Scientific Council

The Agency has carefully analysed the 3rd report of the Scientific Council that once more offers an important contribution to the implementation of the mid-term development of the Portuguese quality assurance system.

Following the 1974 revolution the Portuguese higher education system went through a very fast expansion period that lasted until the mid-1990s. Over this period the major emphasis of higher education policies has been quantity (increasing enrolments) rather than quality. When the Agency started its operations in 2009 one of its major tasks was to eliminate all programmes that did not comply with the minimum quality standards defined by legislation. Unfortunately the Portuguese government did not follow the advice of Herb Kells: when there is a HE system with very clear problems of quality the government should perform an administrative cleansing of the system before a quality agency starts its operation. Therefore A3ES was forced to implement a system for eliminating the worst cases in the system, running the risk of being seen as “the enemy” by a significant number of institutions. This was followed by a five-year accreditation cycle for all the other programmes.

Audit system

In order to mitigate the eventual adverse reaction from HEIs the Agency has decided to support the establishment of internal QA systems and to provide an audit system that would validate those systems operating in compliance with ESG and national legislation. It is gratifying to note that the SC supports the audit process which is already underway as a means for building trust and mutual confidence between the agency and institutions and one of the tools for a future lighter touch approach to accreditation.

We agree with the concerns expressed by the SC about the danger that institutional self-evaluation reports from may become standardized and mainly descriptive, which could have a negative effect on creativity and innovation. The agency has stressed that danger, from the beginning, on its work with the institutions:

- Before the audit process was launched, the agency commissioned and adopted a document¹ that was widely publicized and discussed with institutions, where great emphasis is put on the enhancement side of (internal and external) QA and on the principle that the primary responsibility for quality and QA lies with institutions themselves. HEIs organised a large number of seminars with the agency’s participation.
- A detailed Manual² was prepared and discussed with institutions before being adopted. A set of open reference points (rather than mandatory standards)

¹ [Comparative Analysis of European Processes for Assessment and Certification of Internal Quality Assurance Systems.](#)

² [Auditing Internal Quality Assurance Systems in Higher Education Institutions – Manual for the Audit Process.](#)

was adopted, dully aligned with the ESG and the national legal framework, to stimulate innovation in the design and implementation of internal quality assurance systems. Also, the criteria for assessment is enhancement-led, by following a developmental approach which establishes four possible implementation levels in each of the target areas (non-existing, emerging, in development, consolidated).

- The guidelines for self-evaluation put little emphasis on the descriptive items (Part 1 of the guidelines) – a well-developed QA system should routinely produce information about its organization and results. The bulk of the guidelines concerns analytical items: (i) institutional benchmarks against the criteria set for the audit process for each of the target areas (matrix *criteria* versus *areas of analysis* included in the Manual), presenting concrete evidence and examples that substantiate the system's performance³; (ii) SWOT analysis; (iii) synthesis of aspects that were identified for improvement. The evidences are complemented with available annual self-assessment reports and the consequent improvement plans and their results.
- The on-line form for the self-evaluation report is simple, including one single field for the self-reflection on each target area and provides a generous maximum number of characters for the answers (4 500 or 9 000 characters, depending on the area). In this way, standardisation of self-evaluation reports was minimised.
- The audit process is preceded by a full-day workshop with the participating institutions, where the guidelines are thoroughly discussed, including the emphasis on an analytical approach.

Fourteen institutions have volunteered for the experimental exercise that would select only 5 of them, which demonstrates a positive reaction. The direct feedback from institutions suggests that they see the agency's work as a valuable help in their work to set up their (legally obligatory) internal QA systems.

The development of a lighter touch approach

The audit system will be one of the components of a lighter touch approach the Agency intends to develop for operation once the five-year cycle is completed. The lighter touch system will consist in focusing programme accreditation on a random sample of the programmes offered by the institution rather than going through a new complete cycle of programme accreditation.

In principle the Agency will consider using a light touch system when an institution:

- a) Has a consolidated internal QA system duly certified by the Agency
- b) Offers evidence of average quality above the medium national standards

³ At first reading, the answers provided by the institution in the self-evaluation of its stage of development in each target area may seem descriptive. In reality, it is a benchmarking against the statements in the criteria matrix, to justify the perceived level of its stage of development, i.e., it is the result of a deep self-reflection exercise.

What is an “average quality above the medium national standards” has to be defined in consultation with all institutions. Possible criteria may include the qualification of the academic staff, research activity, selected performance indicators, the updating of the data base for the HE system and, obviously, the results of the first accreditation cycle. This methodology does not substantially differ from the idea behind a “risk based approach” – institutions selected for a light touch approach are also those offering less risks in terms of quality due to their past quality record and their present performance. However we agree with the SC that using a “risk based” terminology would be strongly damaging for the reputation of weaker institutions and needs to be avoided. Actually there is an implicit assessment of different levels of risk when accreditation periods may vary between a minimum and a maximum number of years. However, as the five-year cycle will be completed only in 2016 there is plenty of time for a large debate with institutions and stakeholders in order to establish a consensual methodology.

We agree that the audit initiative must be properly linked with the programme accreditation system. This will be a two-fold process: on one hand, the sections in the form for programme accreditation which presently deal with internal QA procedures will be simplified for institutions with certified QA systems; on the other hand, in the foreseen lighter touch model, audits will be complemented by the accreditation of only a sample of study cycles. The main idea is that the two methods should be complementary, contributing, whenever possible, to the simplification of the accreditation burden on institutions. However, the Agency needs to ensure the social acceptance of the lighter touch model to allow for renewed trust in institutions and their study programmes.

Other comments

- Suggestion “to rate how far each institution has developed an effective educational quality assurance system”: this is already being made as the audit system establishes four possible implementation levels in each of the target areas (non-existing, emerging, in development, consolidated).
- Production of “more ‘popularly slanted’ publications: the Agency will publish in 2013 a number of booklets on the Portuguese higher education system and its institutions, addressing problems such as employability of graduates, the HE network, enrolment trends in HE, the results of the access system, education efficiency of HE institutions and an analysis of the academic staff in Portuguese higher education.
- Suggestion for “making the result of evaluations more easily available to the public- for instance, through a more sophisticated search engine for tracking the results of accreditation”: the results of every programme accreditation are already available in the Agency’s INTERNET site, together with the evaluation reports and the responses of institutions when they exist. It is possible to search by Public/private or university/polytechnic sectors, by institution or by programme. The results are also available at the Directorate General for Higher Education and legislation commands institutions to make evaluation results in the institutional INTERNET sites.

- The SC commends the Agency for allowing that the Agency staff, through the option of taking part in the work of the new Office for Studies and Analyses can shift between more analytical and more hands-on work in the processes of accreditation and evaluation. This, we feel, equally is important for strengthening the Agency's knowledge capital in the future". Indeed this applies only to the Agency's staff hired as researchers – they also participate in visits to institutions as "programme managers". However, a number of staff members are hired as "programme managers" and they in general do not have research activities on a regular basis. However they are encouraged to enrol in post-graduation programmes, namely at PhD level and they participate in conferences and training sessions.