## THIRD REPORT OF THE SCIENTIFIC COUNCIL

TO

### A3ES.

## MEETING OF 10<sup>TH</sup> OF OCTOBER 2012

The Scientific Council (SC) hereby submits its third Report to the A3ES – the Agency for the Evaluation and Accreditation of Higher Education in Portugal. As in the past, we appreciate both the invitation to discuss the current and future state of affairs regarding quality assurance in Portugal, as well as the willingness of the Agency and its leadership to engage frankly and openly in a comprehensive and wide-ranging exchange about how the system in place may be enhanced and strengthened.

The current Report follows on from its two predecessors. We start by paying tribute to developments and activities seen as promising and relevant to higher education in Portugal. In the second part of the Report attention focuses on future-oriented questions. Here we also make some recommendations that we hope may prove beneficial to the Agency in its development of the Nation's system of higher education.

#### **COMMENDATIONS**

In previous reports, the SC noted with great satisfaction the commitment of the Agency to designing a national system of quality assurance that fulfils the expectation of both effectiveness and efficiency. The Agency's effectiveness is linked to the double purpose of balancing the control and the enhancement dimensions of its mission, while its efficiency is linked to the ways by which this is accomplished. With a very modest number of administrative staff, the Agency serves the whole higher education system in such a way that accreditation processes are experienced as swift and predictable by the institutions –

although both universities and polytechnics sometimes may be disappointed with the outcome. In part, the Agency's success appears to rest on a well-functioning electronic platform through which the accreditation processes pass. However, an electronic platform on its own is not sufficient for handling of key decisions yet to be made. Here, both the Agency's staff and leadership should take credit.

From what we have gathered during our visits to Portugal, the SC has good cause to note the Agency's consistency and willingness to abide by the plans and strategies it has set itself. We applaud the capacity of the Agency consistently, steadily and incrementally to build up the national system for quality assurance in Portugal, while making allowance both for experience to be taken into account and for the careful planning of future activities. That the Agency already in 2012 is considering the range of activities it will take up after the completion of the current accreditation cycle in 2016 is impressive, and deserves the appreciation of universities and polytechnics - not least for the degree of predictability it engenders. Predictability should enable universities and polytechnics to plan how, as responsible institutions, they may shape their response to future initiatives. This, SC sees as a system fed by an on-going dialogue between Agency and institutions, a system to be grounded in and building out from trust and mutual confidence between both parties.

A3ES is one of the few quality assurance agencies in Europe, which deliberately and consistently underpins its activities and procedures by research, analysis and careful experimentation. The latter is evident in the piloting of the institutional audits, carried out during 2012. Our examination of the publications and analyses the Agency undertook or commissioned over the period 2011–2012, left us impressed by both the amount of work in this area, by the Agency's international presence and outreach through its disseminating these studies to other Agencies and to the international scholarly community. The SC also commends the development of A3ES's in-house research capacity next to the existing virtually organic links with other research institutes such as Cipes, from the point of view of staff development. In an Agency where

efficiency is at a premium, there is always the risk of overlooking 'competence building' for staff as a key feature of future sustainability. That 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.

We would also like to express our support for the initiatives the Agency has taken systematically to bring students into quality assurance procedures. And in particular A3ES' practice of open tendering for student participation. This is highly commendable. In Europe, student participation is often secured through student interest groups and organizations. While this approach may secure the student interest in many ways, the potential downside is that student representatives are seen less as independent "experts of learning", and more as representatives of an interest group. The Agency's open search for candidates may be a fruitful approach for creating review committees.

### **RECOMMENDATIONS**

We have commented upon, and commended, a number of issues that address the Agency's current operations. In this section, we dwell on some of the issues that the agency is planning for the years ahead. These thoughts and reflections are set out in the hope they may be of service in the deliberations the Agency will initiate.

## SUPPORT FOR AN AUDIT APPROACH

We have learned that the Agency is seriously considering building up an institutional audit approach as a new evaluation method in the years to come. The experiment, already underway, is intended to provide experience and insight about how such a method may be implemented. The SC sees the audit method as highly relevant for strengthening institutional responsibility for quality assurance in Portugal. We support these initiatives. Yet, we would also wish to underline some issues we

hold to be of special importance for developing a successful audit system.

Within the audit system currently being piloted, institutions are required to provide a self-evaluation report. The report has a double function: to provide information and input to the process of external audit, and to stimulate reflection inside the institutions under audit. We were given sight of the way one university filled in an on-line form. Self-evaluation, we feel, may easily become a highly standardized and descriptive component in the audit process. True, it may meet the information needs of external audit committees. But, it also risks failing to stimulate either institutional commitment to, or responsibility for, management of quality. Certainly, there are benefits to be had in standardizing self-evaluations - not least for purposes of comparison. But, there is also the danger that standardization may have a negative effect on creativity and innovation within the institution. Besides, completing an on-line form may be perceived by higher education institutions as simply an administrative exercise to inform A3ES, rather than as an authentic and considered self-evaluation report that stands as a summary of an institute-wide reflection on its quality assurance practices. We would therefore urge the Agency to reflect on what measures might be envisaged to ensure a stronger institutional "buy-in" to the phrase of self-evaluation - especially since it might serve to secure more institutional ownership and identity with the evaluatory process as a whole. As for ways to achieve "buy in" in the UK, the QAA's "learning from audit" reports were held to be a valuable way of spreading knowledge about good practice and clarifying how "quality enhancement" may effectively be implemented at the institutional level. A similar approach might also be useful for A3ES.

The building-up of an audit system, we would suggest, calls for linking the new audit initiative in with existing systems of accrediting study programmes. This poses a two-fold issue. First, coupling a new methodology to existing practices may well be seen as enlarging "bureaucracy" in higher education. To counter this perception, the Agency would do well to invest considerable energy in explaining the value added of audit to higher education in general. Second, adding a new method, almost always runs the risk that the logic underlying the

different methods employed – accreditation and audit – may not align with one other. Nevertheless, building consistency between the two methods and approaches is important. Audits and accreditation are two methods that serve different purposes. As experience across Europe has shown, methods aimed at control tend to dominate over methods aimed at enhancement, even if the latter formed part of the intent at the outset. To achieve a proper balance between the way higher education perceives the two methods is no small challenge. We would submit that along with the audit approach, A3ES develop incentives of sufficient attraction that universities and polytechnics cannot fail to see the benefits that come from actively engaging in the process of audit. The 'lighter touch' approach is obviously linked to this condition, if it is not dependent on it.

# SUPPORT FOR A "LIGHTER TOUCH".

One of the approaches A3ES is considering, so the SC has been told, involves putting in place the technique of "risk-management". This approach has a double purpose: to make evaluation less burdensome for those institutions clearly committed to, and engaged in, the substantive advance of quality assurance; to be more economical with both time and resources at the system level. The SC recognizes these benefits. It recognizes the logic behind the risk-management approach. There are, nevertheless, issues here that merit further consideration.

In the first place, the SC takes the view that indiscriminate use of the terminology of "risk-management" may well undermine the key aims the Agency seeks to advance in the higher education system, not least the development of an audit approach. The Agency's audit initiative, so it strikes us, has as one of its key objectives to forge both trust in higher education and to underline the responsibility of universities and polytechnics for actively upholding their own quality. "Risk-management" builds upon a different logic – that of distrust of universities and polytechnics – and of their workings. Whilst, in part, such differences may stem from differences in semantics, it would be wise not to discount the possibility of the perverse effects such an approach may have upon the evolving relationship between Agency and institution.

Central to this latter issue and most particularly so, is which criteria are to be applied to identifying "risk" in higher education. Given the way A3ES currently operates and the efficiency with which various data sources are exploited and used in Portugal's higher education today, to rely heavily on traditional performance indicators as potential "risk signals" is not without its temptations - or its perils. "Risk management" is not greatly dissimilar to the approach used in accreditation - which, itself is a method clearly used for purposes of control. However, if a policy of "lighter touch" auditing seeks to elevate institutional engagement in quality work as a permanent and on-going responsibility of the individual university and polytechnic, it is questionable whether traditional performance indicators exert sufficient leverage and persuasion to bring about the necessary degree of reflection, curiosity and creativity to support such a process. Applying performance indicators that are more historically conceived or contextually determined runs the risk of setting in place a system of higher education where some universities and polytechnics would always fall into the category of 'high risk institutions' given the precariousness of the conditions under which they currently operate. A technique cannot be sundered from the purpose to which it is put.

One possible approach alternative to establishing a "lighter touch", might be to rate how far each institution has developed an effective educational quality assurance system. Hong Kong, for example, has developed 'maturity ratings' for academic quality work, based upon published academic audit reports.\(^1\) The index ranges from no effort, where the department or institution under scrutiny has no organized educational quality processes, on to firefighting, informal effort, organized effort, and finally mature effort. Departments, schools, and institutions with 'immature' systems of quality monitoring may be encouraged - or spurred on - to do better. Institutions with mature systems recognize the planning, tracking, and performance evaluation of quality processes as important elements of peer accountability and collegiality. They have developed appropriate and feasible performance

<sup>1</sup> Massy, W. F. (2010) Education Quality Audit as Applied in Hong Kong. In M. Beerkens and D. D. Dill (Eds.) *Public Policy for Academic Quality: Analyses of Innovative Policy Instruments*, pp. 209-234. Dordrecht: Springer.

indicators. Hence, a 'mature' system of quality assurance within the individual university or polytechnic may be duly noted and the appropriate institution offered an academic audit regime with a "lighter touch".

NEW OPPORTUNITY, VISTAS NEW: STRENGTHENING INFORMATION TO THE PUBLIC.

Earlier, we commended the Agency for its impressive activities in research and analysis - work that is disseminated both domestically and internationally to fellow agencies, universities and polytechnics. We would also underline the great opportunity that lies before A3ES to act as a valued provider of information on higher education to the Portuguese public in general, not least to prospective students. In contrast to the Agency's 2011 Activity Report, which covered academic publications and information to participating institutions of higher education, more 'popularly slanted' publications may well repay earnest consideration. Both the database and the Agency's webpage provide excellent points of departure for strengthening further information aimed at the general public. While the SC recognizes that current work loads may force the agency to introduce priorities for current evaluations, making the result of such evaluations more easily available to the public- for instance, through a more sophisticated search engine for tracking the results of accreditation - would not only benefit students. It could also pay dividends with respect to the public trust in, and thus the standing of, the Agency.

We remain,

Yours very truly,

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