

## Response to the seventh report of the Scientific Council

We are grateful for the report of the Scientific Council which gives an important contribution to the preparation of the future activities of A3ES. However we do not fully agree with all the comments and recommendations.

The report proposes a narrow utilitarian approach to the research related activities of A3ES: *“many of the studies, publications, and conferences focus on national and international policy issues, which address different concerns and issues of quality assurance from those being addressed by Portugal’s higher education institutions”*. We do not agree with this recommendation. A3ES aims to be in permanent contact with new developments in the area of quality assurance of higher education to ensure that it remains in the frontier of knowledge in the area, the organisation of conferences and seminars being one of the tools used to ensure the permanent updating of the Agency.

The published papers in international journals address a number of themes such as *internal QA systems: their strengths and weaknesses and their impact on teaching and learning; employability; labour market competences; student mobility; academic inbreeding*. These themes are an obvious concern for both the Agency and higher education institutions. Some of these activities are the result of projects initiated by ENQA and ECA and A3ES does not consider convenient to discontinue them, as we consider that collaboration with relevant European organizations is within the remit of the Agency.

The Conference on *Cross-Border Education* and the Seminar on *European Policy Implementation and Higher Education* aimed at better understanding the mechanisms of the European Services Directive and the role of the European Court of Justice in shaping higher education policies not only in Europe, but also in member states. These conferences allowed A3ES to prepare a report for the Portuguese government, which was used to counter the pressures of the European Commission for changes in the Portuguese legislation on franchising of higher education activities. Apparently our arguments were considered convincing by the Commission. The Agency has the legal obligation to advise the government in matters related to quality assurance, to prepare reports and recommendations to the government, and to ensure the integration of Portugal in the European quality assurance system. Other conferences analysed the problems of human capital in Southern Europe and the training of experts.

The Agency has also collaborated with or promoted 17 Conferences and dissemination seminars, most of them to emphasise the implementation of internal QA systems: Lisbon (quality of internationalisation; accreditation of doctoral programmes; the alignment with ESG2015; learning outcomes; internal quality assurance systems - IQAS; training of experts; criteria for certification of IQAS; objectives of IQAS; revision of IQAS criteria for alignment with ESG 2015), Porto (audits of IQAS; objectives of IQAS), Coimbra (QA in higher education; QA of long distance education – eL; QA systems in higher education), Braga (organisation and development of Portuguese higher education), Estoril (audits of IQAS).

The inclusion of non-conventional medicines in the accreditation system was not an option for A3ES. The Parliament passed legislation allowing the offer of higher education programmes in this area and, as no programme can be initiated without previous accreditation, the Agency had to include them in its activities. This was only possible with the help of foreign experts and collaboration with Macao (where A3ES is helping with the development of its QA system). It also illustrates a particular Portuguese problem: when a new market niche becomes available there is an immediate rush to take advantage of this opportunity, even if many institutions do not have the necessary resources.

The maturity of the institutional quality assurance systems has been included in the criteria for a light touch approach – only institutions with A3ES certified IQA systems will be considered. The certification takes into account the level of development of the system – very advanced; substantial; partial or insufficient.

Some problems of the last evaluation of research units by the Portuguese Foundation for Science and Technology have been recognised, namely the excessive use of bibliometrics and this included the results of a report specially prepared by Leiden University for this evaluation. In no circumstances will A3ES use the rankings produced by this evaluation. A new evaluation of the research units is underway and hopefully will eliminate the shortcomings of the previous exercise.

At last, we have the problem of the elaboration of evaluation/accreditation reports which has been a concern of the Agency over the last few years, namely after the publication of ESG015 and the new standard 2.5: *In general, reports should be structured to cover description, analysis (including relevant evidence), conclusions, commendations, and recommendations. **There should be sufficient preliminary explanation to enable a lay reader to understand the purposes of the review, its form, and the criteria used in making decisions. Key findings, conclusions and recommendations should be easily locatable by readers.***

There are many stakeholders to whom the reports could be addressed: academics, students, employers, parents, government and the general public. We agree with one of the findings of the EQIP project (Innovative Quality Assurance & Practice): *It is unrealistic to expect external QA to answer all questions that might arise regarding the quality of a programme or institution, or for the reports to fulfil the information expectations of all stakeholders (including the public). Trying to achieve this would ultimately make the reports unreadable for everyone.*

There are also indications that students in general will not use the QA final reports. Form a report by ESU (2013): *As can be seen, not only are the websites of programmes and higher education institutions the most used but also considered to be the most important sources of information. All other sources of information are far behind in importance: the third most important source of information is "recommendation from other students" with the mean of 0.37. The only other source of information with a positive mean is university rankings. **The least important sources of information are websites of public authorities and quality assurance agencies.***

This can be corroborated by one of us who has participated in institutional reviews of Dutch universities: he has never interviewed a student who declared to have read the evaluation reports. And David Dill (1997) considers that even when reliable information exists and is available, it may happen that many potential students do not know how to access it, or how to interpret it in order to make the best choice. This is designated as the problem of the 'immature consumer' and is one rationale for the implementation of quasi-markets instead of consumer-oriented markets.

This raises the question of identifying the most important stakeholders to be addressed by the reports. We consider that the main objective of QA is enhancing the quality of education programmes, for which the most relevant stakeholders are the members of the teaching staff. Consequently, the reports should address this very specific clientele using adequate language, even if very technical. A more or less detailed summary of the main findings and conclusions could be provided using a more accessible language and this would be addressed to students and lay readers. In any case, attempts at making reports uniform across Europe should be avoided.

These changes will be considered by the Agency in the next round of accreditations. Meanwhile, we have decided to produce brochures containing what is considered to be relevant information about study programmes. Information includes institutions offering the programme, trends in enrolments and graduations, minimum entrance qualifications to enrol in the programme, employment data. We do not provide rankings or information about the relative quality of programmes. It is already bad

enough that some press tries to publish rankings. It would be disastrous to offer an official ranking or official information about the relative quality of programmes.

At last we do not consider feasible the idea of direct assessments of teaching behaviour, such as classroom observations by peers or members of review teams.

In the next accreditation round we will consider collecting examples of good practice that will be discussed in seminars with relevant members of institutions. We will also consider integrating in the final evaluation reports a summary of the main findings and recommendations written in clear and non-technical language, addressing the needs of lay readers. At last, we are instructing the review teams to pay special attention to the integrity and transparency of institutional information, which is apparently one of the main information sources used by students to choose a programme and/or institution. We do not intend to change our research policy.

## References

EQUIP project (Innovative Quality Assurance Policy & Practice) (2017) Draft final report.

European Students' Union (ESU), (2013), *Quest for Quality for Students: survey on students' perspectives* (Brussels, ESU).

Dill, D.D. (1997) Higher Education Markets and Public Policy, *Higher Education Policy*, 10 (3/4): 167-185.

*Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*, 2015.

Dear Alberto,

Thank you very much for your detailed and thoughtful reaction to our Scientific Council report. We apologise for some misunderstandings on our side that may have led to some comments and recommendations in our report not being right on target. Evidently, we sorely miss the insight of Guy Neave, who could fill in background knowledge about many issues being discussed in the Scientific Council.

Maybe we could discuss a procedure for A3ES to review our Council's draft report for errors of fact or understanding before we finally submit it, from next year onwards?

Best regards, also on behalf of the other members of the Scientific Council,

*—Don*

---