

Comments on the existing QA model in Croatia with presenting possible options for refinement measures

Final version, 18 April, 2008

In early February 2007, the CARDS 2003 project Technical Assistance Team (TAT) presented a document with a similar title to the one above as a deliverable of the project.¹ The document was sent to all major parties of the beneficiary. A rather long, and at times tedious, process followed in which the opinions of these parties were formed and then fed back to us, involving both formal and informal, personal and group discussions between them and the TAT, phone conversations, letters and e-mail correspondence, and additional negotiations.

This long process was needed because of the **substantial and very sharp differences of views** of the various parties involved. The CARDS 2003 project TAT has been far from being in an easy and comfortable situation when negotiating with the partners and trying to find a solution for resolving apparently antagonistic differences of views. Actually, the project TAT has had to serve two lords at the same time, for the satisfaction of both of them and, most importantly, while **maintaining our own professional identity and standards of conduct of consulting**.

The major issue (one could even say “demarcation line”) has been the **possible future organisational setup, the delegation of the roles and responsibilities** of the Croatian higher education quality assurance (QA) scene involving also the “proper” interpretation of the relevant current national legal regulations (and even possibly the *European Standards and Guidelines* for QA in HE). Representatives of the **National Council for Higher Education (NCHE)** and the **Agency for Science and Higher Education (ASHE)**, including the Management Board of ASHE on the latter side, have had considerably differing interpretation of the current situation and quite different plans and intentions for the possible future scenario of external QA in HE in Croatia.

In all our relentless efforts and best intentions we still cannot report that all the problems have been solved and none of the differences of views exist anymore. However, we think that due to an extremely delicate and careful consulting and negotiation process we have made some **progress** and can report on **developments** which might help in overcoming all the differences mentioned above.

Thus, **highly respecting the well established and autonomous standpoints and also the effective operation of both the Council and the Agency**, in the current document we try to present our findings and views honestly but as impartially as it is possible, yet with the definite aim of trying to help the interested parties, and Croatia in general, to find their (its) way to an ever enhancing *modus vivendi* of external QA of higher education. This is, in our comprehension, the true role of a Consultant: to be thorough, to be straightforward, to assist and help the Client, to be a **critical friend**.

¹ “Comments on the existing QA model in Croatia with suggestions for corrective measures” CARDS 2003, Zagreb, 1 February 2007.

We would like to say a **very warm thank** especially to two persons who, beside many others involved, devoted a lot of energy, time, and effort to discuss and clarify the relevant issues with, and for us and who in this way, contributed hugely to our current understanding of the QA situation in Croatia, with all its subtleties and potentials, and who have been available for discussion in any form and at any time we needed, even during a well deserved summer holiday. These two persons are:

Professor Antonije Dulčić, Advisor of the President of NCHE, and
Professor Jasmina Havranek, Head of ASHE.

This acknowledgement does not mean of course, that the persons above and the many others not mentioned here by name, are responsible for any possible errors of fact and/or misinterpretation (if any) the present document might contain.

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According to the implementation strategy presented in the *Technical Proposal* and finalised in the *Inception Report* of the CARDS 2003 project, the first two major steps the project was expected to take in order to achieve its objectives are the following:

- Step 1: Review current situation
- Step 2: Define the national quality scheme

Step 1 has been accomplished. The current situation in relation to QA in HE in Croatia has been mapped. The project has produced the respective deliverables as planned. Thus, the detailed information on the current situation is available in those documents (SWOT analysis, evaluation of the survey, final status report). Moreover, the project implementation proceeded in other respects as well.

In the present document the major findings of the mapping exercise are briefly summarised in the first section (providing also some comments) as a background to the second section, in which the elements of a possible refinement of the national quality scheme are presented. The focus of the second section is on the “Who?” – and, to some extent, on the “What?” – question(s), namely, in this document we present and discuss various options concerning the possible roles and responsibilities of the actors in QA of HE in Croatia. The details of the “What?” and, especially, the “How?” questions (exact activities, methods, criteria and procedures etc) can be (re)considered after decisions (if any) on any kind of modifications of the structural and/or operational setup of the Croatian QA system are made.

I. The current situation (major findings with some reflective comments)

- a) Croatian higher education is in the middle of a **substantial reform process**. Croatia in general, and its Minister responsible for higher education in particular, are to be commended for the courage and determination in the transformation process of Croatian higher education according to the Bologna Declaration and the following ministerial meetings’ communiqués. Changes of such magnitude always command respect from external parties even though those actually affected by the changes in the

country may need a longer period for accepting the new situation and to adjust themselves to it.

- b) As part of these reforms, considerable efforts are being taken in order to **introduce and/or reinforce and maintain robust and reliable quality assurance mechanisms** both as far as the internal QA of higher education institutions, faculties, and programmes, and their external QA are regarded. A good part of the necessary legal and organisational steps and measures have been taken, although it is still to be seen and considered as to exactly what extent they are justified by the actual outcomes and impact, and lead to the results intended.
- c) With regards to current external QA mechanisms in Croatia, three major activities can be identified:
- (1) The **accreditation of new programmes** (by NCHE and ASHE), which has been undertaken for all programmes after the restructuring of them in accordance with the Bologna principles and which is undertaken whenever a new programme is proposed by institutions. This is a paper based accreditation exercise of programme proposals or “concepts”, it is not about operating programmes.
 - (2) The **external evaluation (and accreditation) of institutions** (by NCHE and ASHE) which, after a thorough process of conceptual preparation (criteria and procedures defined), has just (re)started in 2008. This evaluation seems to be conceptualized to focus both on the **institutional capacity** to run programmes and to care about quality of the programmes, and on the **actual operation of individual programmes**. This exercise, in the latter aspect, can be considered also as the **re-accreditation** of the current operating programmes.
 - (3) The **quality audit of institutional QA systems**, a new initiative by ASHE. The concept and the procedure have been developed in 2006/07 and three pilot audits have just been finished in Spring 2008.

Altogether however, it is still not fully clear how exactly these three mechanisms and activities are to be related to each other, i.e. what systematic part they will play in the QA scheme of the Croatian higher education system. (See still section j) below.)

Having said all this, and seeing our role as that of a “friendly critic” assisting the beneficiaries, in order to be able to present options for possible modifications, we focus below on some issues we perceived as those that could be considered for such modifications of the current QA scene in HE in Croatia.

- d) It seems to us that the **roles and responsibilities** of the various organisations and bodies in relation to QA in HE (Ministry, NCHE, NCS, NFS, HEIs) **are not conceived in the same way by all the major actors involved**. Differences of views seem to originate not only from current practice, from the **actual operation** of the organisations involved. Some parts of the relevant **legal regulation** can also give rise to differing interpretations namely, various sections of the *Act on Scientific Activity and Higher Education*, the Gov. Decree on, and the Statute of, ASHE, and the relevant

Ordinances of the Minister. Boundaries of responsibilities are especially disputed between some representatives of NCHE and ASHE.²

- e) As to the **composition and membership of NCHE**, the current situation is the following:
- There is an **extensive nomination procedure** for the members of the Council, and they are **appointed by the highest possible body, Sabor**, the Croatian Parliament. Yet, still a **major role is played in the actual selection process** (proposal to the Government and *Sabor*) **by the Minister**. Moreover, the **President of the Council is proposed by the Minister**. Members of the Council have no formal way of expressing their preferences as to who the President could/should be.
 - 9 out of the current 13 members of the Council have **jobs in** (are employees of) **HEIs in Croatia**.

NCHE, in principle and according to the Act (Articles 7-8), has **two different types of roles**. On the one hand, it is the **advisory body** (of the Minister and the Government in general) **for higher education policy and budget issues** while on the other, it is the **expert body** making **proposals for the Minister for accreditation decisions**. In the latter role the Council serves as a **quasi decision making body** of external QA. (As far as we know, the minister has always accepted the accreditation proposals of the Council.) In both functions the Council is assisted by ASHE as an administrative and operational unit, providing also expert assistance.

Now, for the **advisory body** for higher education policy it makes sense that the Minister responsible for higher education policy selects the members and makes the final proposal for the Government and *Sabor*.

Whereas as to the **direct QA role** the two above mentioned features (the Minister's major selection power and the strong representation of HEIs in the Council), if not fully accompanied by robust no-conflict-of-interest rules and mechanisms, **may give rise to challenges as to the actual independence** of the Council. Moreover, especially in relation to the second feature, there is a potential **risk of conflict of interest**. According to the „*Standards and Guidelines for Quality Assurance in the European Higher Education Area*“ (ESG for short, standing for European Standards and Guidelines),³ the organisational and operational independence of QA bodies both from governments and HEIs is one of the crucial elements in the forming European QA scene.

² E.g. Article 15 point 1) of the *Act on Scientific Activity and Higher Education* (herein referred to as the *Act*) says that the Agency (ASHE) provides only “technical and administrative assistance to the national councils for science and higher education”, whereas according to Article 16 point 4) “The Agency performs the assessment ...” and submits “its assessment reports to...”, the latter responsibilities being clearly much more important (and demanding) than simple “technical and administrative assistance”. Moreover, Article 2 of the *Ordinance on measures and criteria for the evaluation of quality and efficiency of higher education institutions and study programmes* states that the Agency “is charged with providing expert and administrative support to the National Council”. (Underlining added throughout.)

³ Accessible e.g. at: <http://www.enqa.eu/files/ENQA%20Bergen%20Report.pdf>

- f) As to the Bologna transition, in relation to the **introduction of new, Bologna-type study programmes**, it seems that there has been **no strong co-ordination on the Faculty and/or HEI level** in many cases. This phenomenon, together with the programme accreditation procedure apparently not devoting major attention to this aspect, resulted in the **proliferation of study programmes** in Croatia. Diversity in itself is not a drawback, of course, quite the opposite usually, but here we experience **some undue structural differences** related to similar programmes in some cases (e.g. the duration of the BA programme in economics is 4 years in Zagreb and 3 years at other universities) and, **overlaps and parallelisms among the new programmes** in other cases.⁴

This situation does not make the **choice of prospective students** easier on the one hand and, on the other, it is **not the best and most efficient way of using the resources** available either on institutional or on the national level.

- g) Another characteristic of the Bologna transition in Croatia is that the **re-structuring and accreditation of programmes** of study in 2005 was undertaken **before a full-scale and robust QA system** had been continuously operating. (Two major external QA activities were (re)introduced after this, in 2007/08, see section c) above.) Moreover, the transition was executed rather quickly, on a **timescale** that few (if any) countries might have attempted.
- h) One of the major currently applied **external QA process** (accreditation of new programmes to be launched) seems to be criticised by some interested parties for **not being transparent enough**, especially as regards the actual application of standards and criteria. (Transparency could be enhanced e.g. by making the expert opinions public.) Moreover, the **consistency of the process and the results** can be challenged to some extent due to the great number of individual experts (reviewers) involved in the accreditation procedure apparently without any major co-ordination efforts and/or training for the time being.
- i) **Bias / prejudice of reviewers from public HEIs against private HEIs** has also been mentioned by some of our interviewees. This is a recurrent issue in the Central and Eastern European region where the establishment and spread of private HEIs is just a recent phenomenon (measured on a historical scale, at least). The exact extent of such an alleged bias is difficult to tell but there can be a grain of truth in the opinion stated by private institutions.
- j) As to the external QA activities currently being (re)introduced, it is still not fully clear what will be the exact **distribution of work, the decisive difference in actual practice between two of the major types of external scrutiny** to be applied. NCHE is (re)launching the **evaluation** (in the narrow sense) process of operating HEIs, faculties, and programmes, which will also lead to the **(re)accreditation** of them (the

⁴ This phenomenon was discussed already in the EUA advisory mission report (p.6., see the exact reference at the end of this document) back in May 2005, mentioning programmes in similar discipline areas having different structures (3+2 and 4+1 at different universities). The EUA team recommended that HEIs (faculties) „should be asked to agree upon a single structural model.“ (p.8.)

accreditation decision according to the Act and the concept for this institutional evaluation is to be made by the Minister). Separately from this, ASHE has introduced the pilot *quality audit* of HEIs (faculties).⁵ This is a clear **parallelism** of institutional evaluation (accreditation) and external audit of the internal institutional QA systems, aggravated by the fact that the NCHE exercise will include also the scrutiny of the basic internal QA documentation of the given HEI (faculty)⁶, an area which is to be covered *per definitionem* by quality audit (by ASHE) at the same time.

Irrespective of the actual situation concerning the introduction of internal QA systems at HEIs in Croatia (see below), such parallel investigations, if really implemented, would mean an **unnecessary extra burden** on HEIs and the national QA body(ies) alike, thereby endangering the actual use and potential positive impacts of both processes.

- k) Based on our mapping exercise it seems to us that although there are some HEIs and faculties in Croatia having introduced **internal quality assurance mechanisms** to various degrees, the **majority of institutions are still only at the beginning** of this process. They definitely need time and help for being able to successfully accomplish the tasks of the initial period.⁷
- l) A related issue is that the majority of those HEIs and faculties who are in the forefront of this development in Croatia introduced an **ISO (9001:2000) system** which is appropriate as far as the **administrative aspects** of operation of a HEI are concerned, but it **cannot most effectively cover other very important aspects** such as e.g. the quality of the teaching staff, curriculum development, or the teaching and learning process itself (including the attainment of intended learning outcomes).⁸

⁵ *Evaluation* is frequently used as an all-embracing term including all types of investigations of quality in HE. Here, however, we use it in the *narrow sense*, as a subcategory of the general term, involving a review and evaluative judgements on the subject of scrutiny but usually not leading to any formal consequences or decisions. *Accreditation* is another type of investigation, based on predefined minimum or threshold criteria and resulting in a formal yes-no accreditation decision concerning the quality of the given subject. An *audit* is the review of an operating quality assurance system i.e. it is a „meta-level“ investigation checking the procedures and mechanisms of the given organisation for assuring the quality of its operation. As opposed to accreditation and evaluation (in the narrow sense), an audit in HE does not involve any direct scrutiny concerning the actual content, teaching and assessment methods etc. of the study programmes of the given HEI.

⁶ See Article 2 of the *Criteria for Evaluation...* documents by NCHE. Or as it is published in a general information document: “During that evaluation cycle, special attention will be given to (...) the establishment of the efficient QA systems.” *Short Overview of Higher Education in the Republic of Croatia*. Zagreb: ASHE, 2008. p.15.

⁷ The CARDS 2003 project has made a survey about internal QA practices among HEIs in Croatia. Beyond the not very high response rate (46 % only, in spite of a repeated mailing of the questionnaire) we learned that only less than half of the replying institutions have introduced an internal QA system in one form or another. They represent about one fifth of all HEIs in Croatia.

⁸ The *Ordinance on measures and criteria for the evaluation of quality and efficiency of higher education institutions and study programmes* prescribes the “introduction of ISO standard in the administrative part of the university components” (Article 4. point 7, underlining added)

II. Possible elements and ideas for the national QA scheme in Croatia

Based on the above observations and the experience of other European countries gained in recent years in relation to the implementation of the Bologna principles and reforms, the CARDS 2003 project offers the following proposals for consideration when deciding on any possible future modification of the national scheme of quality assurance in higher education in Croatia.

1. The **cornerstone** for the quality assurance scheme in Croatia should remain the **Bologna Declaration and the subsequent documents** agreed upon by the European ministers of the countries that have joined the European Higher Education Area. The **basic document** to be considered in this respect is the one accepted in Bergen in May 2005, entitled: *„Standards and Guidelines for Quality Assurance in the European Higher Education Area“* (ESG, for short, see the reference above).
2. The **exact roles and responsibilities** in relation to QA of HE **should be clear to all interested parties**. Any apparently **differing interpretations** should be discussed by the partners involved, with the aim of **reaching a consensus** in these issues. The major actors here are the following:
 - a) Ministry of Science Education and Sports (state administration)
 - b) Advisory body(ies)
 - c) QA organisation(s) external to HEIs
 - d) HEIs
 - e) Students
 - f) Stakeholders (e.g. Croatian Academy of Science and Arts, chambers and other professional and employer organisations)

(As to their possible roles and responsibilities, see section 6 below.)

A clear and widely accepted recognition is to be maintained as to where the **boundary lies between the State and its responsibilities and the HE system itself and its responsibilities**.

The latter responsibilities need to be exercised in the context of the **HEIs being autonomous**, as is emphasised by the Bologna Declaration and in all subsequent stages of the Bologna process.

There could be more self-regulation by the HEIs conjointly, which might be encouraged by the State but not controlled by it. The **organisation(s) responsible for the external QA of HE** (NCHE and ASHE, in the current standing) should be seen as **part of the HE system's own self-regulation**, while being demonstrably **impartial** as between individual HEIs.

The integration of HEIs should emphasise their **corporate responsibility for the quality of what they provide**, encouraged and confirmed by the national QA system. For the universities it should be clear that there is a two tier responsibility: the Faculties being directly responsible for their programmes, educational services, students' progress on the one hand, and the University as a whole having this responsibility for all its programmes, students etc on the other.

3. No matter what the exact structure and setup of the national QA system in Croatia would look like in the near future, a necessary and basic feature of it should be the **reinforcement of the organisational and operational independence** of the body(ies) responsible for external QA on the national level. (See ESG 2.6.6.)

When aiming at reinforcing the current level of independence of the body(ies) involved, the **transparency of the delegation (selection) procedure** of the members of the given body(ies) might be considered, with possibly no major involvement (selection for proposal) of decision makers on the state administrative level. Moreover, the president / chairman of the body(ies) should ideally be **elected** by a secret ballot, by the members themselves.

On the other hand, independence of the body(ies) from HEIs could be ensured by drafting a **Code of Conduct** or **Code of Ethics** for the members / employees of the national QA body.⁹ A major item of that Code could be the principle that members / employees of the national QA body(ies) are working for it in their **individual capacity**. That is, members having been employed by, or working for, any HEI are not in any way representing that institution and cannot take part in the decision making process pertaining to the given HEI (**no-conflict-of-interest rules**). Moreover, **employees** of the national QA body(ies) should not in any form, permanently or on a temporary or ad hoc basis, work for any HEI within the scope of authority of the QA body(ies).

4. As to the **possible general theoretical options** for a national QA scheme from the point of view of **responsibilities and ownership**, the following *major* types of solutions can exist. (The presentation that follows is, in the methodological sense, an “ideal typical” approach.)

a) State owned system

Principle: QA on the national level is the responsibility of the state.

National QA organisation: Department or unit in the Ministry (of Education).

Consequence: Clear solution based on power and centralisation. There are questions concerning real impact, effectiveness and (national and international) acceptance.

Complying with ESG: no compliance

b) Mixed (semi-state) system

Principle: QA belongs to everybody involved in HE, but it is still relatively close to the state. Quality related decisions on HEIs and programmes are made on the (state) administrative level.

National QA organisation: (Semi-)independent buffer body (or bodies), with Ministry participation and/or possibilities for direct or indirect influence.

Consequence: Blurred or not quite unequivocal boundaries of responsibility, possible problems in actual operation. Danger of the emergence of a „compliance culture“ i.e.,

⁹ This Code is not to be the one referred to in Article 112 point 4) of the *Act*. Although, the latter general Code of Ethics for Science and Higher Education could include a section on the national QA body(ies) as well.

the existence of only formal solutions instead of substantial measures in quality improvement.

Complying with ESG: partial compliance

c) Co-operative system

Principle: QA belongs to all partners involved in HE, all having clearly defined roles and responsibilities. Quality related decisions on HEIs and programmes are made on the professional / buffer level.

National QA organisation: Independent (buffer) body(ies) established by transparent and balanced formal mechanisms (e.g. delegation) without Ministry / Government selection, participation and/or possible influence.

Consequence: Acceptance by HEIs and effective operation of the system is facilitated by partnership (involvement) and clear responsibilities.

Complying with ESG: full compliance

d) *Laissez-faire* system

Principle: QA is the exclusive responsibility of HEIs, they decide on internal and/or external QA structures and mechanisms related to their own activities. As to QA solutions, „anything goes“.

National QA organisation: There is no national body. Organisation of QA is up to the individual institutions.

Consequence: QA in HE is driven by sheer market forces. Danger of multiple standards and stratification of HEIs. There is no co-ordinated accountability and consumer protection.

Complying with ESG: partial compliance

These models in their clear forms are, of course, abstractions to some extent (“ideal typical” cases, as it was mentioned) but they definitely **derive from actual practice**. The *laissez-faire* (d) solution characterised HE systems in Europe up until the 70ies, 80ies. Beginning from the 80ies and early 90ies, one or another of the other three options have been introduced in most countries in Europe. Options a) and b) were introduced rather in Eastern Europe whereas countries in Western Europe opted rather for the co-operative model (c).

As the CARDS 2003 project TAT sees it now, the **current Croatian QA system** is somewhere between options b) and c) above. The CARDS 2003 project recommends to consider this issue and try to identify possible ways and measures in order **to get even closer to model c), the co-operative system**.

5. An important element in considering this issue could be the even stronger **separation of the quality aspects and administrative aspects** in the steering and operation of HE in Croatia. That is, a **stronger separation could be made between the (external) quality reviews and judgements** (accreditation) on the one hand, **and the decision on licensing HEIs and study programmes to operate** on the other. This separation should be

reinforced both conceptually and operationally (as to the ownership of the relevant decisions involved).

The major form of quality review that has been employed in Croatia is accreditation.

- **Accreditation** (the attestation of quality **involving the accreditation decision**) is to be fully performed by one (or more) completely independent **professional entity(ies)**. (As to the organisational setup there are various options, see below in section 7.)
- Whereas **giving state recognition and permission to operate** („licensing“ of HEIs and study programmes) could remain the responsibility of the **respective state authority** (the Minister).

In an ideal case, there should of course be a **very strong correlation** between the accreditation and the licensing decisions (i.e. only accredited HEIs and programmes should be licensed by the Minister and allowed to operate) but these two types of activities are better to clearly separate according to the **different fields of expertise and authority they in essence involve, and belong to**. (Theoretically, licensing could even be replaced by accreditation by the professional body(ies) taking into account also the national policy and development plans for higher education.)

6. By fully implementing the *co-operative model*, the **major roles and responsibilities of the actors** involved in QA of HE in Croatia could look like this.

- a) Ministry (state administration)
 - overall strategy for HE,
 - central policy making role, including quality policy,
 - initiation and preparation of drafts of national level regulations concerning HE,
 - state recognition and permission (“license”) for HEIs and study programmes to operate.
- b) Advisory body (or bodies)
 - advice to Ministry (+ Government and other stakeholders) in relation to strategy, policy, financing, and regulation for HE in general, and QA of HE in particular, (e.g. advice on a national QA scheme),
 - taking part in the definition and refinement of methods, procedures, standards and criteria for external QA on a consultative basis,
 - proposing projects, surveys and various measures for helping to improve the quality of Croatian higher education,
 - commissioning sector wide studies, reports, analyses,
 - monitoring of international developments.
- c) National QA organisation(s), external to HEIs
 - external QA of HE including the design and implementation of methods, procedures, standards and criteria, and the actual conduct of reviews (evaluation / accreditation / audit) resulting in final report and decision (if accreditation or audit) on quality of provision, recommendations for quality enhancement,
 - providing information on the quality of HE to all the partners and the public at large, including regular disciplinary or sector wide analyses (ESG!), organising workshops and seminars,

- preparing reports and discussion papers,
- monitoring of international developments, international networking.

The QA organisation(s) can have other tasks and responsibilities as well, according to the special national setup, as e.g. ENIC-NARIC office, centre for statistics of HE etc. (See the example of *Högskoleverket*, the national agency in Sweden.¹⁰)

d) HEIs (i.e. institutions as a whole, universities, and faculties)

- responsibility for the programmes, educational processes, students' progress,
- establishing, operating and refining internal QA mechanisms of the institution / faculty and its study programmes,
- co-operation with the national QA organisation(s) in actual external QA activities,
- taking part in the definition and refinement of methods, procedures, standards and criteria for external QA on a consultative basis,
- national and international co-operation and networking in relation to QA.

e) Students

- taking part in the formation, operation and monitoring of the national QA system, student involvement in the work of the national QA organisation(s), student membership in it (them) is advisable,
- taking part in the formation and monitoring of the internal QA systems at HEIs/faculties,
- taking actively part in the regular self-assessment exercises of HEIs/faculties,
- participating in the external evaluation procedures of HEIs/faculties/programmes, possibly as members in review teams.

f) Stakeholders

- taking part in national level consultation processes concerning HE in general and QA of HE in particular,
- taking part in the definition and refinement of methods, procedures, standards and criteria for external QA on a consultative basis.

It is important to emphasise that the national QA organisation(s) should in any setup have **appropriate resources, both financial and human**, and staffing of it (them) should be in line with the tasks and the high level **professionalism and QA and HE related expertise** generally expected from such staff in countries in Europe.

7. As to some **possible refinements** of the actual organisational setup of external QA in Croatia the CARDS 2003 project team identified three major possible options.

- a) The **current situation remains** with clear **mutual understanding of the exact roles and responsibilities** of the HE Council and the Agency (see section 2 above). The Council is the decision making board for accreditation and reaccreditation. If the Council is also to make separate decisions on audits of the institutional QA systems then members with more specific expertise in quality management would

¹⁰ <http://english.hsv.se/>

also be needed. If that role belongs to the Agency, it needs some further staff development.

- b) **NCHE (plus NCS?) and ASHE are united as one organisation**, the current NCHE (and NCS) becoming the expert body of the **unified national QA entity** whereas the current ASHE staff could serve as the Secretariat to the Body. (This unified organisation could be assigned with the tasks under both 6.b and 6.c above.)
- c) The **role of NCHE could be elevated to a strategic advisory level** and its current tasks in relation to the **actual operation of the external QA system could be passed on to ASHE** (with possible reconsideration of its current internal organisational structure). This shift would require a **substantial staff development** at ASHE, both as far as the number, and profile and qualification of the QA staff are concerned. (According to this option NCHE could have the tasks as listed under 6.b, while ASHE with its Board could be assigned with the tasks under 6.c. above.)

There are **examples for all three arrangements in Europe** (see e.g. the organisational setup of the German agencies as to option b), or Sweden for option c.)

As to option b), it is still worth mentioning that **it is not very easy to meet all the challenges and effectively accomplish both the strategic-advisory (6.b) and the substantive and operative QA functions (6.c)** at the same time, by one organisation, in cases. At least the Hungarian experience shows that the *Hungarian Accreditation Committee* – consisting of an expert body and a Secretariat, corresponding to option b) above – for most of its activities is immersed in the actual and mostly operative tasks of running the external QA system, and thus does not have the necessary time and energy to deal with strategic level questions and making sector-wide analyses.

8. An additional issue to be possibly considered follows. Quality assurance of higher education in the last decade or so **became a profession**.¹¹ It is not science (and never will be) but it is definitely a profession, having not only procedures, rules and standards¹² but quite a substantial body of theoretical and practical knowledge, methods and skills, the acquisition of which needs considerable time and effort even if it is accomplished in a „learning by doing“ way. That is the reason why it is not very easy for otherwise excellent and highly esteemed disciplinary experts to become and work as „quality assurance experts“ overnight. One of our Croatian interviewees coined a very good term for describing the challenge and the situation in its entirety: the disciplinary experts are „**amateur experts**“ in quality assurance.

One (and perhaps the most effective) way of handling this situation is to have „**real professional QA experts for higher education**“, who – after having been trained – can practice the profession as full-time employees of HEIs (as quality officers) or the relevant external QA bodies and organisations. Good practice shows that for expert teams involved in various evaluations in external QA activities it is best to have both **disciplinary (and**

¹¹ See e.g. David Woodhouse, „The quality of quality assurance agencies“. *Quality in Higher Education* 10(2004) No.2. pp. 77-87.

¹² Beyond the ESG cited above, see the document issued by INQAAHE, the worldwide network of quality assurance agencies in HE, „Guidelines of Good Practice“ INQAAHE, August 2007 (and preceding versions). Accessible at: <http://www.inqaahe.org/docs/GGP%20V3%20August%202007%20final.doc>).

management) experts (scientists, professors, representatives of the given profession) and **QA experts** (QA officers at HEIs and staff members of the relevant national QA organisation(s)) in the same team working together and mutually adding their expertise to the final product, the evaluation report. It must be emphasised that **agency staff members** in these teams can **work really as experts themselves**, and serve not only for making notes and drafting the evaluation report (although they usually accomplish the latter tasks as well). Such expert groups were employed with full success e.g. in the recent ENQA project (TEEP 2) evaluating international joint masters study programmes in Europe¹³, and in another joint venture with the participation of EVA, the Danish National Agency, and QAA, the UK Quality Assurance Agency in evaluating the chemistry study programmes in the two countries.¹⁴ As a „second best“ solution, QA experts can come from industry and the business sector as well, but in that case they definitely need to have a thorough background knowledge about HE and the specialities of QA in HE.¹⁵

9. On the level of the higher education institutions in Croatia, beyond the major tasks envisaged and discussed in various documents, e.g. in the *Education Sector Development Plan 2005-2010*, an important and urgent task could be the **review of the situation in relation to the Bologna transition, the introduction (and accreditation) of new study programmes**. Although we understand that there are strong financial and existential interests in the background, we think that the most effective way of handling and solving the related problems would be a **thorough self-review and self-regulation of the HEIs** involved. HEIs could review their own programmes and make all the necessary steps to streamline the programme offer and to eliminate parallelisms. (Otherwise, the co-ordination of the launching of programmes could be a task for the institutional senates, relating to the intended reinforcement of institutional autonomy.) HEIs in this exercise could possibly be supported by some co-ordination on the national level. In this co-ordination the national body or bodies being responsible for external QA could also play a role.

The **national level co-ordination** in this respect could be aimed at eliminating the undue structural differences between similar programmes. This could be done either as part of the work on the development of a **National Qualification Framework** or separately, a **general structural framework** for bachelor (and master) programmes could be worked out, determining the major characteristics of the Bologna-type study programmes in Croatia.¹⁶

¹³ The final evaluation reports and the methodological report of this project are available at:

<http://www.enqa.eu/pubitem.lasso?id=34912&cont=pubdetail>

¹⁴ <http://www.eva.dk/Default.aspx?ID=950>

¹⁵ E.g. the Hungarian national agency has a standing subcommittee of such experts and moreover, employs such QA experts also on a regular basis for taking part in the work of the visiting teams in institutional accreditation processes.

¹⁶ We are not advocating them, just provide the information that such a structure exists e.g. in Germany (KMK regulations as Ministerial Ordinance) or Hungary. In the latter case study programmes and their major characteristics (including name, qualification provided, specialisations, ECTS credit number, major areas of studies etc.) are defined based on a wide consultation process involving all the relevant actors in HE. The result is a current list of possible BA programmes in Hungary (published as an Annex to the relevant government decree), and the so-called „Programme and Graduation Requirements“ for each (Ba and Ma) study programme, published in a Ministerial decree (in case the draft PGR is supported by the expert opinion of the Hungarian Accreditation Committee).

10. In correlation with the above task the **financing system of HE could be reviewed** as well, aiming at solving problems related to the phenomenon „everybody launches everything“ in order to get more money for operation.
11. All this could very well be helped by an **impact analysis of the performed ex-ante programme accreditation** of the new, Bologna type degree programmes. Results of this analysis could also be fed into the possible refinement procedures of the national QA system.
12. For the ex-ante programme accreditation of new programmes the **inclusion of a deadline determining the future ex-post accreditation** of the given programme in operation could be considered. That is, it could be decided still in the paper based, ex-ante evaluation process when the ex-ante accredited “concept”-programmes are to be (ex-post) re-accredited after some time of operation. This period should possibly not be very long but still should allow the programme in question to develop and produce some results in operation.
13. The primary responsibility for the quality of higher education programmes lies with the higher education institutions themselves. It is therefore important that in harmony with the *European Standards and Guidelines*, institutions (faculties) establish **internal institutional quality assurance systems**. But in this area, and not only in Croatia but in other parts of Europe as well, **more patience, time and support are needed. HEIs should get all the necessary help and expert advice** they need in order to establish and operate robust internal QA systems and mechanisms. Moreover, HEIs should have the **necessary resources, both financial and human**, and enjoy an appropriate degree of **autonomy** in order to be able to develop and operate their internal QA systems. They should nevertheless, not forget that autonomy means **responsibility and accountability** at the same time.
14. As to the establishment of the **actual internal QA systems at HEIs**, the adherence to **three basic principles** on the national level can be proposed: **diversity, fitness for purpose, and effectiveness**. HEIs should have the freedom to choose from among the various options available for internal QA systems and solutions. These can include systems based on the ISO standard(s), the TQM philosophy, the EFQM self-assessment model, and any individual system developed on the basis of the objectives, strategy, and specialities of a given higher education institution or faculty. The institutional (faculty) QA system should nevertheless, meet the requirements of the *European Standards and Guidelines*.
15. The “**minimum**” requirements concerning the internal institutional QA systems at each institution (faculty) could be the following:
 - a) Each institution (faculty) should be expected to have a well defined and clear **strategy** based on a thorough mapping exercise (SWOT analysis). Then, based on the strategy, there should be a **quality document** (handbook) presenting the
 - **quality goals** (What?),
 - **quality mechanisms, procedures** (How? covering all major activities!),

- **roles and responsibilities in relation to QA** (Who? involving students!) of the given institution (faculty).
 - b) The QA model described in the quality document should actually be **implemented**.
 - c) There should be organised and regular **monitoring and feedback**, both internal and external, built in the system.
 - d) Finally, monitoring and feedback should be followed by **acting on findings**, the implementation of actual **corrective and quality enhancement measures**. The quality loop should be closed.
16. The **introduction of Quality Assurance Units** or centres at institutions and faculties is an idea and intention we consider being very good and therefore we strongly support. These units can play a major role in the establishment and operation of the internal institutional quality assurance systems. Moreover, a **national network** of them (possibly organised by, and operating under the umbrella of, the rectors' conferences?) can serve as a very useful information platform for discussing problems and spreading good practices. However, it is important that **even a network of these units should remain on the institutional level** and should not get any mandate concerning suprainstitutional external QA activities. The latter should remain the responsibility of the national organisation(s) external to HEIs.
- In relation to this the CARDS 2003 project proposed the establishment of an **internet based platform, a Higher Education Quality forum**. The project offered its help in establishing such a forum and it contributed also to the implementation of the idea. The HEQ Forum is ready for online discussions and to receive postings, it is accessible at <http://forum.azvo.hr/>
17. Considering the current situation in Croatia, it seems to us that **ongoing specific advice and guidance is needed by HEIs** for the establishment and implementation of internal QA units, measures, and mechanisms. (Good practice descriptions, guidelines, standards, performance or quality indicators, implementation of surveys and processing the results.) The CARDS 2003 project has also contributed to these activities by holding seminars for both HEI representatives and ASHE staff respectively, organising workshops on this theme, presenting foreign practices and experience, and providing opportunities to share ideas and discuss possible options.
18. Moreover, for any possible future refinement of the current system, it is advisable to launch a **wide consultative process** involving all the major partners having an interest in HE. Beyond the Ministry, the Councils, the Agency, and stakeholder organisations, the **involvement of a broad spectrum of experts from HEIs** (including private institutions and students as well) could be considered. The external QA system should in every country, in accordance with the *European Standards and Guidelines*, be **transparent and clear to all**. This aim is best served when every interested party has the opportunity to take part in the relevant discussions.
19. Any possible future refinement of the current QA arrangements should be based on a **holistic approach, on the system level**. Issues to be possibly (re)considered could include the **objects or “targets” of external QA** (HEIs / faculties / degree programmes / themes / internal QA systems); the **type(s) of external QA** activities (evaluation / accreditation /

audit) and the like. Especially, issues related to the apparently intended **parallelism of accreditation and audit should be clarified**. The relationship between **institutional** and **programme** (or disciplinary) evaluation could be decided on. The possibility of the introduction of **thematic evaluations** (as e.g. implementation of the credit system, ICT situation, assessment of students etc) could also be considered.

20. In 2007/08 ASHE has launched **pilot audit activities** with the participation of three faculties in Croatia. Upon request of the Agency, the CARDS 2003 project advised and assisted ASHE in this endeavour. Nevertheless, it seems to us that for the time being, **HEIs in Croatia are not really ready for the launching of an overall external audit scheme** focussing on their internal quality assurance system (QAS), basically because of the fact that most of them simply do not have such a system to be audited. The introduction of such an audit scheme could be made by the following steps.
- a) First, the **general national QA framework** could be reconsidered and agreed upon by all the partners (Ministry, Councils, Agency, Bodies of the heads of HEIs, HEIs themselves, student bodies, major stakeholder organisations). The exact place and scope of audits of institutional QAS are to be clarified in this framework. Experience from the three pilot audits could be fed in this work.
 - b) Most of the HEIs seem to need **detailed advice and assistance**, both professional-human and possibly, financial, as to the development of internal QAS.
 - c) The **procedural and methodological details** of the audit scheme (including standards and criteria to be applied) are to be refined in consultation with HEIs, building also on the experience gained through the pilot audit project by ASHE. Special attention should of course be devoted to the *European Standards and Guidelines* in this respect, too.
 - d) Regular **external audits** should be **launched only after some introductory or pilot period**, and based on a clear **cycle-plan**. HEIs should have the time for preparing for the exercise, including the **possibility for making an internal audit** and the necessary corrective actions based on this, preceding any regular external audit activities.
21. Before introducing an overall external audit scheme, the implementation of a **full cycle of external institutional evaluation and (re)accreditation of operating programmes** would be advisable. This could include a programme level investigation (i.e., all programmes of the given institution or faculty) as well, the evaluation of the **impact of the introduction of the new, Bologna-type study programmes** (see the related proposals above in sections 9 and 11), and could also encompass a „**capacity accreditation**“ element relating to the evaluation of the personal and material-infrastructure **resources** of the given institution / faculty from the point of view of the maximum number of students to be enrolled and, perhaps even more importantly, it could also focus on the **HEI's capacity for running programmes and caring about quality on the institutional level** (quality management element). All this could mean the preparation for a rather smooth shift towards institutional audits, if that is intended in Croatia. (Our current understanding is that the NCHE documents on institutional evaluation do include also the scrutiny of such an **institutional level quality aspect** of the operation of the given HEI.)

22. The institutional level external evaluation could make good use of a well defined set of **quality indicators**. These should include not only **input** data but indicators related to the teaching and learning **process** and the **output/outcomes** as well.
23. It still must be mentioned that “**external**” **evaluation** in itself may have two forms **depending on its initiation**:
- a) The HEI (faculty, programme) can **voluntarily initiate** an external evaluation (or accreditation or audit) on its own, **independently of the actual national external QA obligations**. (E.g. EUA, the *European University Association* runs an Institutional Evaluation Programme involving such self-initiated evaluations for HEIs. Similarly, EFMD, the *European Foundation for Management Development* runs EPAS, its voluntary programme accreditation scheme being available for its member institutions.) In this case the (voluntary) external evaluation is **part of the institutional quality management system**.
 - b) The other, and more widespread case is the one when external evaluation is **part of a national QA scheme** in which this external evaluation (or accreditation or audit) is **usually mandatory** for HEIs (and/or faculties, programmes).

A possible future refinement of the national QA scheme in Croatia **could consider both of these cases** and e.g. make also option a) above available for HEIs (faculties, programmes) even perhaps through the national organisation(s) being responsible for the b) type, mandatory external scrutiny.

24. With regards to the role of **Information Systems** in a possible QA scheme for Croatian higher education we refer to another paper of the CARDS 2003 project specifically focussing on Higher Education Information Systems and the role of ASHE in this context.¹⁷

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Finally, we would like to emphasise that the CARDS 2003 project TAT is ready to provide any further clarification or more information related to all the above, and we are more than happy to assist Croatian experts in any possible future work, if needed.

¹⁷ E. Frackmann, „Higher Education Information Systems and the Agency for Science and Higher Education“. Zagreb: CARDS 2003, 06 March 2008. See also other documents produced under Component 3 of the CARDS 2003 project.

References and relevant major documents

As source material for the writing of this paper we refer to the many interviews we have conducted, workshops and seminars organised and/or attended, lectures and presentations listened to and/or delivered, informal personal e-mails and oral communication received, and various public and non-public documents we have produced or had access to. From among the latter the following are outstanding.

- 1 *The Act on Scientific Activity and Higher Education* (30 August 2004)
- 2 *Ordinance on measures and criteria for establishing higher education institutions* (29 December 2004)
- 3 *Ordinance on measures and criteria for the evaluation of quality and efficiency of higher education institutions and study programmes* (29 December 2004)
- 4 Government Decree No. 1946 on ASHE (available only in Croatian), *Uredbu o osnivanju Agencije za Znanost i Visoko Obrazovanje*, 15 July 2004
- 5 The Statute of ASHE (available only in Croatian), *Statut Agencije za Znanost I Visoko Obrazovanje*, 24 February 2005
- 6 *Education Sector Development Plan 2005-2010*, MSES, Croatia, 2005.
- 7 Higher Education Reform in Croatia: results of EUA advisory mission 4-7 May 2005 (The document was kindly provided for us by the MSES.)
- 8 OECD Thematic Review of Tertiary Education, Country Report of Croatia, Draft, May 2006 (Provided for us by the MSES, not for official use.)
- 9 Documents related to the institutional evaluation (accreditation) exercise to be (re)launched by NCHE in 2008. (Criteria, procedure, guidance and tables on self-evaluation). Zagreb: NCHE, 4 July 2007.
- 10 Documents related to the quality audit of HEIs / faculties launched by ASHE in 2008. (Audit Handbook and related presentations). Zagreb: ASHE, various versions in 2006 and 2007.
- 11 *Short Overview of Higher Education*. Zagreb: ASHE, January 2008
- 12 CARDS 2002 project documents
 - Peter Debreczeni, “Some remarks on the role of the Agency for Science and Higher Education (AZVO)”, October 2005
 - Hugh Glanville, “Notes regarding the potential role of the Agency for Science and Higher Education”, October 2005
 - Hugh Glanville, *Quality Assurance in Higher Education*. A manual. March 2006. 47.p.
- 13 *Inception Report* of the CARDS 2003 project (Draft version, October 2006 and revised version, January 2007)