

Commentary of the ESG revision steering group on the comments received through the open consultation and from the BFUG

25th February 2014

1. The framework and rationale

Purpose of the paper

The purpose of this paper is to provide a commentary from the ESG revision steering group on the comments received from the BFUG and other entities during the revision process. In particular, explanations are provided in respect to those comments that have not been taken on board as suggested, with a specific focus on structural matters.

It is important to underline that the steering group has made great efforts to produce a coherent text for the revised ESG, and believes that this has now been achieved. It is important to understand, therefore, that any further changes would need to be carefully considered in the light of all the other parts of the text. Coherence is of particular importance in this context, as the ESG are not a policy document, but a guide for practical work by QA agencies, HE institutions and other stakeholders involved in the quality assurance of higher education in the EHEA. The steering group is proud to underline that the submitted proposal is a result of a consensus among the stakeholder organisations.

Background and stages of consultation

During the revision process the steering group has used different channels to receive feedback to the revision drafts. The first formal stage of consultation took place in March 2013, when an open consultation process was carried out. The purpose of the consultation was to collect proposals from a wide range of actors in European higher education, and in particular from the national ministries in the EHEA, members of the Bologna Follow-Up Group. The basis of the consultation was the revised introductory text to the ESG, which set out the context, principles, purposes, and the scope of the document.

During the spring, summer and autumn 2013, the different organisations engaged in the revision process consulted - in different ways - their constituencies and collected feed-back which then fed back into the drafting process.

The first comprehensive draft was presented to the BFUG in its meeting on 7 and 8 November in Vilnius. The presentation led to an extensive exchange of views and provided a significant number of suggestions for the revision. In addition, written comments were received both from the BFUG members, as well as from other stakeholders between November 2013 and January 2014.

The ESG revision steering group has been impressed and pleased to receive a significant number of very well elaborated comments on the previous drafts of the revised ESG. This has been taken as a sign of the importance that the ESG have gained, and the role they play in the different national contexts.

All the collected comments were discussed in detail by the steering group in its meetings of 8th January and 7th February 2014. Care has been taken to respond to all concerns to the extent possible.

Approach to the integration of comments

All the comments and suggestions provided in writing or orally, have been carefully considered by the revision steering group at different stages of the process. Several important suggestions for the improvement of the document were taken on board by the steering group and have led to important changes and improvements in the proposal.

At the same time, several of the comments received were related to a specific national system, or to specific national priorities. It is important to underline that the ESG cannot address all details considered important by one or more individual countries, as they need to take into account the great variety that exists in the European context and to represent what is genuinely agreed and accepted practice across the EHEA. Also, as was clear already in the BFUG meeting in November 2013, several comments were in contradiction to others received from other countries, which indicates again the diversity of the HE systems, and the different needs of different national contexts.

Several comments made by different entities addressed issues that had already been discussed in detail by the steering group during the previous stages of the revision. The reasons for the approach taken by the steering group – and thus for not taking on board some of the comments received – are provided in this document.

2. Commentary on the proposed changes: introductory part and overarching issues

Purpose of the ESG

The steering group had spent significant time in the previous phases to discuss the purposes of the ESG. The group agreed that there was a need to underline that the ESG may be implemented in different ways and that therefore the starting points may groundwork can be different in different contexts.

Balance between parts 1, 2 and 3

Several comments received regarded the apparent imbalance in the length and level of detail of the different parts. In particular, concerns had been voiced regarding the level of detail of the guidelines in Part 1.

The group took this comment very seriously and has systematically evaluated standard by standard whether all the guidelines provided were needed and where they could be shortened or reduced: only those considered necessary for the understanding and implementation of the standard are now contained in the proposal made by the steering group to the BFUG. However, different levels of explanation (and thus lengths of the guidelines) for different standards is due to their different scope and types of issues addressed in them.

Difference between standards and guidelines

In the earlier phases of the revision process a significant amount of effort had been made to clarify and make more consistent the difference between the standards and the guidelines. The steering group agreed, however, that the wording “will want” used in the guidelines in the November 2013 draft could be misunderstood by non-native English speakers as being prescriptive, and this was a serious concern for the group. New formulations have been found to replace “will want” in the guidelines.

The group has underlined in the definition of the guidelines that each institution or agency would need to decide which elements of the guidelines are relevant in their context. In addition, under standard 1.1, the text emphasises now that it is up to institutions to decide how to translate policy into processes, and further explains that the ESG allow for a great variety of approaches in their practical implementation. It is important to understand that not all guidelines will be relevant in all contexts.

Focus of the document on QA processes and the link to the Bologna instruments

Several comments received indicated that there was a need to clarify once more that the ESG are about quality assurance, not quality as such. At the same time, the group wishes to

point out that QA and the related procedures are in place, of course, in order to ensure quality. A clearer link between QA and QFs has been integrated to ensure that the link, and the contribution of QA to quality, is clear.

Many comments regarded the insufficiently clear distinction between intended and achieved learning outcomes. The steering group agreed that a clear distinction would be important. The proposal submitted to the BFUG reflects this, in particular in standards 1.2, 1.3 and 1.9 and its respective guidelines.

The steering group is strongly of the opinion that the ESG are one of several “Bologna tools” and that an adequate implementation of all of the tools is needed to achieve and ensure good quality programmes and institutions. Following this logic, the ESG cannot be considered responsible for the implementation of the other instruments and their relations to each other.

Employer involvement in QA and employability

The steering group decided to maintain the Council of Europe reference to the four purposes of higher education, as in the November 2013 draft, and considered this a balanced way to address employability. The group agreed to mention in addition employer involvement in the context of the guidelines on stakeholder involvement in quality assurance.

Integration of research into the ESG

The steering group had discussed the integration of research into the ESG from the early stages of the revision process, and had come to an agreed position that the ESG do not and should not address the evaluation of research as such, while underlying the importance of the links between research and learning and teaching, as part of the quality assurance of education provision. This was reflected in the November 2013 draft.

Some of the BFUG members have expressed a renewed interest in integrating research into the ESG. However, the steering group argues that such a change in the ESG would require very fundamental reforms in some of the EHEA systems, and it is considered unlikely that the current methods of evaluating research would be modified to comply with the ESG. Also, it should be noted that several countries were against a stronger emphasis on research in the ESG.

The group underlines that the ESG are specifically about learning and teaching, and in this framework, it is the links between teaching and research that are of fundamental importance, rather than the ways in which research as such is evaluated. This does, however, not preclude individual countries from developing integrated approaches to quality assurance of teaching and research, if seen appropriate and useful. The ESG's focus on teaching and learning does not mean that ESG-compatible quality assurance systems may not address other aspects as well.

Need for a glossary

Several entities had expressed the need for a glossary throughout the revision process. The steering group agrees on the importance of clarifying the terms used, but maintains that the presentation of a comprehensive glossary on QA and HE terminology would be a nearly impossible task in this context, and outside of the scope of the revision exercise. The group has thus decided to explain the key terms used, and their meaning in this context, in the section on “Context, scope, purposes and principles” as well as in footnotes where necessary.

3. Commentary on specific proposals for Parts I, II and III

Part 1

Standard 1.2

Some comments suggested inserting a reference to ECTS in the standard, together with a specific reference to the ECTS Users’ Guide. The group has integrated a separate bullet point on ECTS to give them more focus. However, the steering group considered reference to documents that could be modified at any time (such as the ECTS user’s guide) as not appropriate.

Standard 1.3

Several comments expressed concerns about this standard being about quality, rather than quality assurance. The standard has thus been re-written so that the focus is on how universities can deal with the challenges posed by a more diversified student body and of student-centred learning. The issue of assessment of students, previously dealt with in standard 1.4, has further been integrated into this standard so that it covers the areas of learning, teaching and assessment comprehensively.

Standard 1.4

The main concern with this standard had been its length and the variety of issues addressed in it. The steering group has integrated changes to improve clarity while at the same time decreasing detail. This has led also to restructuring between standards 1.3 and 1.4.

Standard 1.5

Some of the criticism related to the lack of reference to resources in the ESG part 1, in general, and in standard 1.5 in particular. The group decided, however, that the reference to resources that is made in 1.6 is sufficient, and should therefore not be repeated under 1.5.

Standard 1.8

The group had received a proposal to include a requirement for information on employment data to be provided under this standard. The group decided not to take this proposal on board, as it would make the guidelines of 1.8 longer, and would create repetition with standard 1.7 where such data is already referred to in the guidelines.

PART II

The group had received several comments indicating the need for more references to the Bologna tools in part II. The group argues, however, that it is the primary responsibility of HEIs to ensure the quality of their programmes, and it is HEIs that need to take into account e.g. the qualifications frameworks, or the use of ECTS, when designing their programmes. It is the task of the agencies, on the other hand, through standard 2.1, to assess whether this is done properly. The group agreed that the ESG should not convey the message that it is the task of the QA agencies to control the implementation of the Bologna Process.

The steering group took up a proposal to include a separate standard on peers in panels.

Standard 2.3

The publication of reports appeared in two standards: 2.3 and 2.5. The steering group has consequently modified the standard 2.3, which makes now reference to reports as an element of the QA process, without specifying anything about their publication, which is covered entirely in standard 2.5.

Standard 2.5

Some comments received expressed concerns related to the publication of the formal outcomes of processes undertaken by agencies. The group agreed that there was a need to make clarifications, as the purpose was not to suggest that the agency should publish e.g. the ministry decisions based on the QA reports, but rather the final outcomes of their own processes.

PART III

A new standard on external reviews of agencies has been added to part III.

Standard 3.6

The reference to the “core values of the EHEA (...) in the Bologna Communiques” was not found appropriate by some countries. The sentence had been misunderstood as indicating that QA should be used for the advancement of the Bologna Process. The reference has been reformulated to reflect these concerns.