



International comparisons and trends in external quality assurance of higher education: Commonality or diversity?

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Abstract. The paper explores international comparisons of the extent of commonality or diversity in the main national external quality assurance frameworks for higher education. It has been suggested, from an European survey, that there are common features in national quality assurance frameworks (van Vught and Westerheijden (Quality Management and Quality Assurance in European Higher Education: Methods and Mechanisms) 1993; Luxembourg, Commission of the European Communities, Education Training Youth). The paper extends the survey, tapping other comparative reports.

These comparisons show that a 'general model' of external quality assurance does not universally apply, but that most elements of it do apply in most countries. We conclude that the 'general model' provides a starting point from which to map deviations. In each country, there may be specific additions of elements or omissions from the model, but more usually there are modifications or extensions of elements. These variations are determined by practicalities, the size of the higher education sector, the rigidity/flexibility of the legal expression of quality assurance (or the absence of enshrinement in law), and the stage of development from state control of the sector. Some additions to the 'general model' are suggested.

The paper also considers efforts to produce an international scheme for external quality assurance of higher education, and the applicability of the 'general model' to the transfer of quality assurance frameworks from country to country.

Keywords: agency, assurance, compare, education, higher, international, model, quality, State, university

Introduction

This paper explores international comparisons of purposes of external quality assurance (QA) in higher education (HE), together with the extent to which the main national QA frameworks for carrying it out mainly exhibit commonality or diversity. It has been suggested, following a survey for the European Union (EU) that there are a number of common features of national QA frameworks (van Vught and Westerheijden 1993); these features in essence provide a 'general model', to which individual national arrangements may be converging. However, a later study for the Institutional Management in Higher Education programme of the Organisation for Economic Co-operation and Development (OECD) challenged the extent of applicability of such a

'general model' (Brennan and Shah, 2000a,b), and therefore challenged the extent of any international convergence. The present paper extends the survey more widely, tapping reports of other comparisons amongst national QA frameworks, before concluding that the model is a useful one from which to identify variations.

Purposes of external quality assurance of higher education

Neave (1991) surveyed quality assurance frameworks in France, Belgium and the Netherlands, and commented on the elusiveness of quality, stating that "there is no agreement on the purpose of quality assurance, save only as a resource allocation device or perhaps as a resource withdrawal device". This is an over-simplified approach, and later commentators have instead seen QA purposes as pluralistic and forming a continuum. Kells (1995) proposed a spectrum of purposes from 'improvement' through 'public assurance' to 'government goals, targeting resources, rationalisation'. Wahlén (1998), surveying the HE evaluation in four Scandinavian countries, noted that Sweden and Finland emphasised improvement, while Denmark and Norway emphasised purposes external to the higher education institution (HEI). Kells' (1995) diagram suggested that various other evaluation system attributes could be categorised on related spectra: framework for judgements from 'stated intentions' through 'peer opinions' to 'government norms and comparisons'; primary procedures from 'self-evaluation' through 'external peer review' to 'indicators and ratings published'. Kells (1995) also claimed two trends in national evaluation schemes:

- (a) schemes move towards more internally driven concerns, putting more emphasis on self-evaluation, self-regulatory activity and the institutional infrastructure for it;
- (b) schemes become less related to government influence, and more related to improvement, management and strategy, with more feedback from clients.

Kells observed that universities act more maturely if they are treated as 'trusted adults' than as 'children'; they seize responsibility for evaluation and self-regulation. He also suggested that QA schemes become more effective, useful and change-oriented as the use of performance indicators and direct funding links decreases.

Frazer (1997) sent a questionnaire based on Van Vught and Westerheijen's (1993) four component model (national agency; self-evaluation; peer review; report) to 38 European countries, and received useful responses from 24 countries (Austria, Belarus, Belgium – Flemish, Bulgaria, Cyprus, Denmark, Estonia, Finland, France, Germany, Hungary, Iceland, Ireland – other HE,

Latvia, Lithuania, Netherlands, Norway, Romania, Slovakia, Slovenia, Spain, Sweden, Turkey, UK). Frazer confirmed the spectrum of main purposes of external evaluation, from accountability to improvement, observed by Vroeijerstijn (1995). The most important reasons for introducing external evaluation were, in descending order of references:

1. assisting HEIs to make improvements;
2. accountability to stakeholders;
3. changes in law (e.g. increased autonomy of universities);
4. inform potential students and employers about standards;
5. assist government in making funding decisions.

There is a tension between promoting diversity and conformity. While the purpose may be to sustain or promote diversity, the pressure of accountability to stakeholders causes HEIs, in practice, to conform to whatever they judge is likely to get them the best external evaluations.

So, summarising the above surveys, the purposes of external quality assurance appear to be variants of a mix of the same functions, which can be boiled down to:

- improvement of quality
- publicly available information on quality and standards
- accreditation (i.e. legitimisation of certification of students)
- public accountability: for standards achieved, and for use of money
- to contribute to the HE sector planning process

This demonstrates considerable commonality at the heart of national QA, in the shape of a spectrum from the “softer” (developmental) improvement/informational functions to the “harder” (judgemental) legal/financial/planning functions. We now turn to what the implementation of such purposes has produced, in the form of national QA frameworks.

Dimensions for comparison of national quality assurance frameworks

Harman’s comparisons (1998) covered, besides Western Europe, Australasia, Brazil, Chile, China, Columbia, Hong Kong, Japan, Korea, Philippines, South Africa, Taiwan, Thailand and the USA. His paper was structured around variations in organisation of the key features:

- purpose;
- national agency;
- body responsible for QA within the institution;
- whether participation is voluntary or compulsory;
- methodology (self-study, external peer review, site visits, reference to statistics, surveys of students, graduates, employers and professional bodies, or testing of students);

- focus (teaching, research, both, institution, national system);
- reporting and follow-up.

Van Damme (2000) suggested that there are international commonalities and variations in quality assurance models, along the following dimensions:

- the notion of quality
- purposes or functions of the QA system may be about (a) improving teaching and learning; (b) public accountability; (c) steering the national HE system in terms of resources and planning. The first has an internal focus within the HEI, the others focus externally
- the methodology used: (a) self-evaluation; (b) peer-review; (c) performance indicators; (d) quality audit – meta review (of the internal quality control processes) at the national level
- the responsible agency/unit
- voluntary or compulsory participation
- focus on research, or teaching, or a combination
- focus on review of programmes, disciplines, or institutions
- reporting is confidential or public (with or without grading)
- range of follow-up activities
- decision-making dependent or not on the QA results (funding, accreditation etc.)

Smeby and Stensaker's (1999) study was of variations across the four Nordic countries, based on six variables, which are broadly a sub-set of Van Damme's:

- whether an independent managing agent exists, and if so the status
- who initiates and decides which field or unit is to be evaluated
- extent of standardisation of evaluative methods and procedures
- who nominates and appoints the evaluators
- whether other types of quality assessment are used, e.g. a national database
- how are evaluations followed up by institutions and central authorities (e.g. funding)

We can add dimensions to these lists, based on the other studies surveyed later:

- the role of national HE law in determining the status and form of national QA
- national QA encourages development or rigidity
- whether professional bodies have any role
- whether external examiners are used, a particularly UK angle
- extent of transparency of internal and external QA processes
- which stakeholders' views are taken into account, and whether there is any direct observation of teaching

- whether evaluations include grades or ranking

In the previous section we explored the first two of Van Damme's dimensions, and in the following sections other dimensions above are considered, in terms of in terms of commonality or variation.

Common external QA features: Convergence

The following common elements of the QA frameworks for HE in France, the Netherlands and the UK were found by van Vught and Westerheijden (1993):

- a national agency to co-ordinate and support QA within institutions, which is independent of government;
- self-evaluation as the vital focus of the external QA process;
- external peer review to explore the self-evaluation with the HEI (normally by a site visit);
- public reports of these evaluation activities;
- no direct relationship of the results of external QA to the funding of HEIs.

Vroeijenstijn (1995) added to the above, the importance of transparency of external processes, of internal quality care in the institutions, and of a follow-up process after the report. Similarly, Maassen (1997) found common features in Denmark, Flanders and the Netherlands, as did Donaldson et al (1995) in France, Denmark, the Netherlands and UK, and Wahlén (1998) in Denmark, Finland, Norway and Sweden, whilst Woodhouse (1996) and Harman (1998) considered that national external QA frameworks were converging internationally. The features converged upon are as above, plus:

- effective QA processes internal to the HEI;
- support of self-evaluation by standard quantitative data on effectiveness of performance;
- distinctions between the level of aggregation evaluated, which may be programme, subject, department/faculty or institution.

Of the 24 countries, covered by Frazer (1997), all claimed to evaluate teaching quality (subject or programme), 14 to assess research, and 22 to evaluate at institutional level. It is possible that respondents did not all interpret the rubric of the questionnaire consistently, and some statements may be aspirations rather than actuality. All external evaluations started from self-evaluations (except one country), and supporting statistics are prescribed by the agency (except seven countries). Frazer (1997) was concerned to discover that the meaning of self-evaluation is becoming distorted by the pressure of accountability, and is now interpreted by some to mean 'presentation of self to external body', and in the best possible light, rather than self-reflection. Frazer queried whether self-evaluation would occur without pressure from

external sources, and whether honest self-evaluation is compatible with the competitive nature of much of HE.

Peer review is used in all 24 countries, which Frazer (1997) surveyed, (except one which uses ministry inspectors). All, except one, use some peers from outside HE; 16 use some peers from other countries. Mostly, peers are selected by the agency. Site visits by peers are always made (except two countries). Direct observation of teaching is only undertaken in nine countries. Student opinion is always taken into account (except three countries), and employers' views are considered in 14 cases.

The legislative review edited by Brennan (European Training Foundation, 1998) covered twelve countries of Central and Eastern Europe (CEE), funded by the EU Phare programme, with some overlap of Frazer's (1997) survey. In 1998, all except Albania and Macedonia (which expected a new law for this purpose) had national QA agencies, and these were mostly established by parliaments, governments or education ministries; in Poland, the agency was established by the Schools of Higher Vocational Education, and deals only with these HEIs, although other accreditation commissions for other HEI groups had been set up by 2000 and a new law was expected. The constitutions and powers of these agencies vary considerably from country to country, as does the focus of quality assurance:

In most countries during the transitional period from centralised to more autonomous open and free higher education systems, quality assurance was considered through 'first generation' legislation, rules and requirements. Clarification of the distinction between quality assurance through laws, which regulate and restrict behaviour with higher education, and quality assurance through evaluation, which makes public judgements about such behaviour, is a current task for higher education systems in the Phare countries. (European Training Foundation 1998)

However, in all these countries, developments were reported (European Training Foundation, 1998) to be compatible with the van Vught and Westerheijden (1993) 'general model' of QA. Seven of these CEE countries had introduced legal provisions emphasizing *accreditation* (i.e. legitimisation of institutions and programmes to award degrees and diplomas), with varying references to evaluation/improvement; Poland emphasizes accreditation, but through voluntary agencies, and Lithuania and Slovenia have instead developed improvement orientated QA without accreditation. "Among the twelve Phare countries, we have found some confusion as to the purposes of quality assurance. . . . A specific need in relation to purposes is a clarification of the difference between accreditation and evaluation" (European Training Foundation 1998). Different countries are at different stages in a line of

development from state control of all aspects of HE to more autonomous HEIs accompanied by mechanisms of accountability. "... a framework of state control through accreditation is not necessarily the best context for the achievement of improvement goals" and "in the long run, serious consideration of the self-regulating potential of a professional organisation (higher education institution) will be required."

The observation of different stages of development can also be connected to Neave's (1988) concept of the 'Evaluative State' as an alternative to regulation by bureaucratic fiat: "By switching evaluation to the output of higher education systems, so (it is argued by the governments in Britain and the Netherlands) one may abandon detailed and close control over how individual institutions fulfil national policy." 'De-juridification' is the replacement of detailed HE laws, which are obstacles to flexible HEI responses to their environment, by 'framework' laws to incite self-regulation. This situation of framework laws thus sits between centralisation and decentralisation, and depending where different countries' evolution towards it starts, they may perceive it as producing greater or less state control. Thus, while a snapshot at one time may show diversity of QA, this could be part of a pattern of converging on the 'Evaluative State' from different directions. In Britain, juridification – i.e. a move to an 'evaluative state' from decentralisation – has been seen as greater central control. In the, Finland, France, Netherlands and Sweden, lessening formal legal controls and moving towards the 'evaluative state' is perceived by HEIs as bringing greater flexibility. Most CEE countries are at different stages in developing from state control of all aspects of HE to more autonomous HEIs accompanied by mechanisms of accountability (European Training Foundation – EFT 1998), but Poland and Slovenia may (like Britain) perceive those mechanisms as reducing the level of autonomy that their HEIs had.

On the basis of a comparison of the QA frameworks in Australia, Denmark and Sweden, Brennan (1997) suggested that debates about quality assessment are frequently debates about power and change in HE. Brennan and Shah (2000a, b) compared quality assessment in fourteen countries (Australia, Belgium, Canada, Denmark, Finland, France, Greece, Hungary, Italy, Mexico, Netherlands, Spain, Sweden and the UK), on the basis of information from 29 institutional case studies for an OECD project. They found a convergence in the regulation of HE, but with some differences in methods. The three main methods they categorised were: self-evaluation, institutional quality assurance, and external evaluation reports. They considered the impact of quality assessment within HEIs in three ways: via rewards (e.g. status, income, influence), by changing internal policies and structures, and by changing HE cultures. The three categories of method, they suggested,

impacted differently, so that self-evaluation impacted on cultures, institutional quality assurance on cultures and structures/policies, and external evaluation impacted on structures/policies and rewards. Brennan and Shah (2000a, b) concluded that the introduction of external quality assessment has weakened subject-based culture, and shifted the power distribution within HE from the basic unit (e.g. department) to the institutional level of management, policies and regulations, and has strengthened extrinsic values (society/economy) over intrinsic (academic) values as both managerial and market concerns have acquired greater importance compared with disciplinary academic concerns.

Aspects of variation from the model: Diversity

Despite this general impression of commonality, Gandolfi and Von Euw (1996), who surveyed quality management in 590 European universities, gaining a 23% response rate from England, Germany, Italy, the Netherlands and Switzerland, found “a lack of a clear and internationally recognised model in order to introduce an integrated system for quality management.” Brennan and Shah (2000a) did not go this far, but did challenge the convergence model of van Vught and Westerheijden (1993), which they pointed out was only based on EU countries with some consideration of the US and some other frameworks. They reported variations from the model, in regard to national agencies, level and focus of assessments, self-evaluations, peer reviews, publication of reports, and funding links.

1. Agencies may be set up by government, owned collectively by the HEIs, or independent of both, but all are responsible for recruiting and training academic and other peers. They derive legitimacy, i.e. academic authority, by co-opting from the academic community. Submission to external evaluations by HEIs may be voluntary or compulsory. Follow-up may be by the agency, government or not at all. Not all countries have an agency (e.g. Italy), and in some countries there is not one single agency (e.g. Canada, Germany, Mexico, USA). Mostly QA agencies are nominally independent of government and the institutions, and reports are published, except in the USA and Netherlands where accreditation reports are confidential. The Vereniging van Samenwerkende Nederlandse Universiteiten (VSNU, Association of Co-operating Universities in the Netherlands) is owned and funded by the Dutch universities, while English, Scottish and Welsh quality assessments are contracted to the Quality Assurance Agency for HE (QAA) by the higher education Funding Councils which are quasi-autonomous bodies, and in France the Comité National d'Évaluation (CNE) reports directly to the President not

the Prime Minister or any Ministry; in the USA, accreditation agencies are private bodies. There is no commonality in the existence or absence of links between QA and funding of HEIs.

2. The level of evaluation may be sector, institution, faculty/department, subject/programme or individual staff, and the focus may be on teaching, research, or both, or management. These differences correspond to varying values/criteria. Institutional evaluation tends to be managerial (e.g. accountability), whereas subject/programme assessment usually incorporates disciplinary academic values, but in the UK emphasizes pedagogic criteria; the Danish approach emphasizes employment values.
3. Although 29 of the 30 agencies in Europe, studied by Frazer (1997), reported using self-evaluations as the basis for external review, these may also be initiated by the institution or department for other purposes. Most agencies prescribe guidelines or a framework of questions for self-evaluations, but they differ as to whether they expect the self-evaluations to be self-critical and analytical, or just to provide information.
4. Although virtually all agencies use peer review, there are differences in who are the peers, what is expected of them, how they are selected and trained, how visits are organised, the duration and coverage of visits and who is seen during them. They may derive their source of authority from their collected knowledge, values and reputations, or from the powers of the agency. They may be made up of a single subject group, or a mixture, they may include (as well as disciplinary experts), pedagogic experts, managers, international peers, experts from industry/commerce and students, and they may be put together for specific visits or (only in small countries) for all visits in that subject. Face-to-face discussions are general, except when assessing research, and who is seen depends on the level/focus of the evaluation (academic staff, managers, administrators, students). Classroom observations, as used in the UK, are rare.
5. Differences in reporting relate to the summative or formative purposes of evaluation. Where the former predominate, reports contain explicit statements of outcomes, e.g. pass/fail or a quantified grade, and are written for an external audience. Where the emphasis is formative, the audience tends to be academic, and the reports emphasize recommendations. Where there is considerable institutional autonomy, as in the UK, this tends to be compensated by a summative approach to quality assessment, emphasizing accountability. Where there is strong state regulation of the HE sector, as in continental Europe, there is no need for further control through QA, and a more formative approach is common, emphasizing improvement. Sometimes there is only a sector-wide report for each subject, but more usually each institution gets its own report. According

to Frazer (1997) the reports of external evaluations are openly published in 13 of the 24 countries which he surveyed. *Numerical* grades are only given by England and Scotland (not Wales), although some others give grades in the form of textual descriptions. Only five countries claimed a direct funding link. 12 countries' agencies follow up the recommendations in external evaluation reports, and in two further cases, the ministry does this.

Brennan and Shah (2000a) concluded, from these comparisons, that the 'general model' of van Vught and Westerheijden (1993) is most applicable to countries with medium-sized and less diverse HE sectors, and with a tradition of state regulation:

Small countries encountered practical difficulties in attempting to operate an objective and expert process of peer review in the absence of sufficiently large academic communities to provide objective peers. Large countries faced problems in achieving consistency and avoiding escalating costs in coping with the scale and complexity of mass and diverse higher education systems. While criteria of consistency and fairness called for the standardization of assessment procedures, criteria relating to diversity and 'fitness for purpose' called for more flexible procedures. A tradition of state regulation seemed to ease the acceptance of external quality assessment within the academic community, in that it allowed a quid pro quo of relaxation of regulations in other areas.

However, most CEE countries still have un-reformed state regulation of HE (despite some state constitutions declaring HEIs autonomous) together with state imposed external QA (accreditation) requirements (European Training Foundation, 1998). Billing and Temple (2002) surveyed the external QA frameworks of the CEE countries, using data from web sites (EFT, ENQA, INQAAHE, MAB.HU/CEE, SEE-EDUCOOP) and personal communications as well as publications; they found that Poland had several agencies (for different HE sectors), that the Czech Republic did not use self-evaluations and that there was some confusion about the circumstances of report publication.

Van Damme (2000) found convergence in continental European approaches to quality assurance, but differing from the Anglo-Saxon model, which he said is one of accreditation; this has spread to other countries, from the UK to the Commonwealth, and from the USA to Latin America, the Pacific, Asia and Eastern Europe. This is a mistaken view – the UK model since 1992 (when the CNAA was disbanded) is not one of accreditation, and for universities it never was (except for professional bodies); the USA accredits institutions, not programmes (except for professional bodies),

unlike many of the other regions listed by Van Damme. What Van Damme saw as variation, others see as convergence within a spectrum which mixes the polarities in his list (above).

All Nordic countries have established evaluation systems which include institutional self-evaluation and external peer review, including at least one international peer (Smeby and Stensaker, 1999). All these systems report the results of QA to the relevant Ministry, and publish for the general public, but none of these Ministries have linked quality assessment to funding, or to other direct steering. Although there is consistency on the last of their variables (see list above), the systems vary considerably on the other five, the dominant influence being the particular balance determined by the agency between needs internal and external to the HEI. Among these countries the design of quality assessments is the most related to external use in Norway, and in Sweden it is the most related to internal use. The systems are highly adjusted to each country's specific governing strategy for higher education, and the procedures have resulted in very incremental changes in the existing power structures of HE.

Only three European countries independently review the national QA agency's work, effectiveness or impact on the students' experience, and one of Frazer's (1997) main conclusions was surprise at this and the need to introduce such meta-evaluations; he was not sure that all agencies are 'adding value', especially in countries with small HE sectors. His other conclusions were about training, rhetoric *vs* action, and the effects of variable autonomy. The greatest need was for training and development: agency staff, peers, and HEI staff. "Despite all this activity, lack of resources, lack of adequate training and reluctance to become involved on the part of many academics on the grounds of 'autonomy' has meant that there is more rhetoric about quality assessment than action in some countries."

Turner et al. (1999) reported on the differences between the Japanese QA system for non-universities and the UK system from which it borrowed, the latter having since moved on considerably. The National Institution for Academic Degrees (NIAD) was established in Japan in 1991 (a year before the disbandment of the UK Council for National Academic Awards, CNAAB) for non-universities. As a result of the domination of degree conferment by the law, in Japan, the NIAD is bureaucratic, rigid, and is not (unlike the late years of the CNAAB) in partnership with HEIs in sharing values or advising and supporting them, or moving towards recognising any autonomy in HEIs. The law in Japan defines degrees and the fundamental framework of degree granting; until 1991, Bachelors' degrees were not recognised qualifications. Also, there is a wide range of achievement standards in Japan, both at entry

to HE and at graduation. There are more differences than similarities between the non-university NIAD and CNAAC contexts.

Mok (2000) compared the different effects in Hong Kong and Singapore of importing different international QA practices, and in particular the importance of the different purposes for doing so. Hong Kong's model was imported by its University Grants Committee from the UK (RAE and TQA) subject-level procedures, and the effect has been to make HEIs more managerial, but another pressure in the same direction has been the recession in Hong Kong, which has underlined the need for demonstrable HEI performance and productivity. Singapore has had no major financial problems, and QA has been used to enhance the competitiveness of the country in regional/national markets; so, the two universities have sought institutional reviews by foreign experts and then undertook institutional self-evaluations.

A comparison, of Institutional-level evaluations in Hong Kong, New Zealand, Sweden, the UK and also by the Council of European Rectors' (CRE), was undertaken by Dill (2000). His analysis covered the following dimensions of such 'academic audits': audit goals, audit scope (e.g. institutional mission, strategies, structures and improvement, accountability, quality culture and management), process orientation, audit initiation, make up, selection and training of the audit team, documents submitted, audit visits, report formats and distribution, follow-up and quality enhancement. Dill concluded that, in every case, academic audits had acted as catalysts for change, in the following ways:

- helped initiate or bolster development of QA systems within universities;
- placed attention to improving teaching and student learning on institutional agendas;
- helped to clarify responsibility for improving teaching and student learning at the individual, academic unit, faculty and institutional levels;
- reinforced institutional leaders in their efforts to develop institution-wide 'quality cultures';
- facilitated discussions, cooperation, and development within academic units with regard to means for improving teaching and student learning;
- provided system-wide information on best practices and common problem areas; and
- offered visible confirmation to the public that attention is being paid to academic QA.

Organisational cultures

Differences of quality culture have been mentioned above several times. Thus, van der Wende and Kouwenaar (1993) identified some problems with international comparisons of external quality assessment:

1. Cultural differences affect how 'quality' and 'level' are defined
2. Data is not available in the same form, and opinions differ widely on which indicators should be used to measure quality
3. Basic elements of the structure of educational systems and programmes differ greatly, and the terms used to describe these are subject to interpretation
4. National variation in educational objectives
5. Subjectivity – everyone uses their own system as the frame of reference for judging other forms

Can cultural differences, within and outside HE, explain the different patterns of national QA frameworks? Mintzberg (1983) proposed two basic parameters¹ for describing organisational culture, 'power distance' and 'uncertainty avoidance'. He plotted what he assumed to be different country's organisational preferences on these two dimensions; for example Great Britain would be low on both indices and prefer coordination of work through mutual agreement, France would be high on both and prefer standardisation of work processes, China would be high on 'power distance' but low on 'uncertainty avoidance' and would prefer direct supervision, Germany would be low on 'power distance' but high on 'uncertainty avoidance' preferring coordination through standardisation of skills, while the USA would be intermediate on both indices and prefer standardisation of inputs.

Hofstede (1991) developed four general dimensions of culture within organisations:¹ 'power distance'; 'uncertainty avoidance'; 'masculinity'/'femininity'; and 'individualism'/'collectivism'. These were measured on employees in similar organisational settings (IBM) in 50 countries, using surveys. For example the survey on 'power distance' asked how often are employees afraid to express disagreement with their managers, how autocratic *vs* consultative is their boss's actual decision-making, and what is their preference in this regard. The questions on 'uncertainty avoidance' were about job stress, whether company rules should ever be broken, and intention to stay with the company. Some data for a typical range of countries is shown in Table 1.

Kells (1999) proposed that evaluation systems will not transport between very different cultures; for example, Mexico scored highly on 'power distance' and 'masculinity', and therefore should need a different evaluation system to Denmark which scored low on both. Certainly Mexico and Denmark do differ significantly in their QA frameworks.

The Mexican national framework was described at several points in Brennan and Shah's (2000a) book. The national agency, CONAEVA (Comisión Nacional de Evaluación de la Educación Superior), operates at three levels: institutional self-assessment, peer review of academic programmes, and the whole HE system. Information from the self-assess-

Table 1. The four Hofstede (1991) indexes of culture for various countries (IBM employees, 1970)

Country	Power distance index (PDX)	Uncertainty avoidance index (UAI)	Masculinity index (MAS)	Individualism index (IDX)
Australia	36	51	61	90
Denmark	18	23	16	74
France	68	86	43	71
Germany FR	35	65	66	67
Great Britain	35	35	66	89
Greece	60	112	57	35
Mexico	81	82	69	30
Netherlands	38	53	14	80
Portugal	63	104	31	27
Turkey	66	85	45	37
USA	40	46	62	91
Yugoslavia	76	88	21	27

ments is used to influence government funding decisions, which “reverses the more usual idea that self-assessment is mainly about improvement and external assessment is mainly about accountability and/or allocation” (Brennan and Shah 2000a). Funding increases can be used by the universities to make extra salary awards for academic staff. In addition, the achievements and productivity of individual staff are assessed through two schemes operated by another agency, CONACYT, which determine whether extra salary bonuses are paid for research or for teaching excellence. A third national agency, CENEVAL, administers standardised examinations to test the knowledge and skills of students leaving secondary school and those finishing undergraduate degrees; participation in the former is compulsory, but the latter are voluntary. So, in Mexico, the market approach of financial incentives replaces the regulatory mechanisms used in continental Europe.

By contrast in Denmark (see Brennan and Shah 2000a), the government set up and funds a Centre for Quality Assurance and Evaluation, which undertakes programme-level evaluation of teaching; Denmark also has a system of external examiners, as in the UK. A steering committee is established to evaluate each subject across all institutions, and this includes employers as well as academics, and it looks for international comparability by including peers from other Nordic countries. The Centre is very involved at all points:

organising meetings to help institutions prepare self-evaluations, conducting user surveys (students, recent graduates, employers), and after the visits by the steering committee holding a conference of all the visited institutions; then the final report is published, and each institution has to present an action plan to the Ministry of Education.

Although this contrast between Mexico and Denmark seems to support Kells' (1999) proposition (above), his generalisations fall down. Kells constructed a table of 'probable characteristics of national evaluation systems, arranged by major cultural dimensions', these being the first three in Hofstede's list, above. But the Hofstede data is old – collected on IBM employees in 1970 – and much has changed, not only in terms of former Soviet block and Yugoslav countries becoming independent, but in terms of introduction in CEE and CIS countries of pluralist democratic political systems, HE reform laws and moves at different rates toward market economies and away from collectivism. Further, the indices of cultural dimensions in comparison Western countries, may have changed significantly since 1970. It is not very useful in 2003 to be able to suggest, in Kells' terms, greater likely success in transplanting to 1970s Yugoslavia a QA system from Portugal, rather than from Great Britain (or USA, Germany, Denmark etc.).

Other problems arise in trying to use Kells' (1999) table. His two quoted examples (Mexico and Denmark) sit nicely at the top (high power distance, uncertainty avoidance and masculinity) or bottom on all three scores, but other countries straddle the two halves of his table. For example, applying the table to Great Britain (on 1970 indices) should have led to a QA framework focusing on self-evaluation, but simultaneously that self-evaluation would have been difficult; and both to using performance indicators and yet low reliance on standards. Applying the table to Yugoslavia (in 1970) would have meant both little public reporting and general public reporting; favouring the best and not favouring the best. There is a final problem, in applying the power distance index to government and academic organisations, which is that Hofstede (1994) showed that power distance decreased in ascending the skills ladder, from 'unskilled', through 'clerical' and 'technicians' to 'managers' of the previous categories, 'professional workers' and 'managers of professional workers' – the last two categories probably representing those who have to design, negotiate and operate QA systems. This implies that the cultures in which the QA systems have to work have much lower power distance than Hofstede's general cultural averages.

Summarising these attempts to apply Kells' 1999 table, the details do not stand up to scrutiny, but it is still possible that the principle remains, i.e. that caution should be applied in assuming that the same type of QA system will emerge or be appropriate in countries with different cultures. However, it

is also possible that academic cultures occupy a more compressed range of variation than wider social cultures, so that QA systems for HE could still be quite similar while social cultures differ.

There is much theory on differences of organisational culture across HEIs within a higher education system, for example as summarised by Billing (1998). Four organisational types were distinguished: 'market' and 'adhocracy' which were externally orientated; 'clan' and 'hierarchy' which were internally orientated. The former could manage quality by coupling it to their responses to their market and users of their services, i.e. they could become 'learning organisations'. The extent of variation in HEI autonomy is an important parameter of academic culture (Frazer 1997). Kells (1995) and Neave (1988) expected that when national HE systems permit institutional autonomy, at least for some types of HEI, those HEIs act more maturely, seize responsibility for evaluation and self-regulation, become more related to improvement with more feedback from clients, and respond more flexibly to their environment. Kells (1995) detected a trend in this direction. Further, Billing and Temple (2001) proposed that evaluations at the institutional level (focusing on validating institutional self-evaluations), compared with programme-level accreditations (focusing on regulating teaching inputs), would be more liberating and developmental and would empower HEIs to become more self-regulating, innovative, responsible, and responsive to market needs (see also Dill 2000, quoted above).

International borrowing of national QA frameworks: Convergence?

There are pressures in many countries, especially in Central and Eastern Europe, to develop national external QA mechanisms for universities. Often, particularly through an internationally funded (e.g. World Bank, EU) project, the starting point is to modify an existing Western model of national QA. Billing and Thomas (2000a) summarised the sparse literature on whether QA frameworks can effectively be transferred from one country to another. The most useful work was from countries formerly under the sway of Soviet systems. Tomusk (1995) gave an account of the dissolution in Estonia of Soviet style centralised and authoritarian quality assurance and their intended replacement by ready-made Western European standards. He was sceptical that such transfer was achievable. Two years later (1997), he was even more pessimistic, finding that where new procedures (advocated by international organisations and consultants) were not internalised by the academic community or related to the character of the particular higher education system, concentration of power was recovered at the highest possible level.

Tomusk (2000) further analysed post state-socialist QA practices, proposing that the:

relationship between the political power and orthodox academe allows even in the current public policy vacuum using them primarily in one direction, fighting non-traditional institutions, programmes and teaching methods. While post state-socialist countries present their QA initiatives as a part of the Westernization programme (except in the Russian Federation, Central Asia and Transcaucasus, where there is a three-stage process of institutional licensing, attestation and prescriptive accreditation), they stand in strong contrast to the 'fitness for purpose' mantra applied in Western Europe. However, there have recently emerged signs, for example, the OECD performance indicators project, suggesting that the convergence of east and west may take place not through relating post state-socialist QA processes more closely to local contexts, but by a radical decontextualization of the Western approaches.

Tomusk (2001) also reviewed the new QA systems in CEE countries 10 years after their introduction. "The main problem with the newly established quality assurance procedures seems to be the failure to promote academic excellence and merely substitute one political mechanism for another." He identified ways in which political interests are driving the new QA procedures in the region:

- (i) government agencies are looking for legitimate justification to close programs or institutions, in conditions of increasingly scarce funds, so that a negative accreditation often results in losing State funding, in some instances also closure of the institution or program;
- (ii) traditional institutions are threatened by the rapidly increasing private HE sector, with its attractiveness to best qualified students and those able to pay for studies.

Like Tomusk in Estonia, Hergüner and Reeves (2000) found, in Turkey, reversion to earlier cultural patterns when systems were not internalised by the academic community. They presented a longitudinal study of the effects of trying to implement total quality management (TQM) concepts in a Turkish HEI, in particular the relationship between national culture and institutional corporate culture. Although this is only one case study, the authors' main conclusion was that the maintenance of TQM systems without continued senior management commitment may not suffice to secure change and prevent a reversion to earlier cultural patterns, and that this is suggestive of the pressures imposed on organisational change by national cultural patterns.

Ryan (1993) looked at applications of total quality management, self-evaluation and formal accreditation in Central and Eastern Europe. He concluded that countries must individualise the evaluation and accreditation system they adopt so that it becomes compatible with specific cultural and national factors, while upholding international norms of quality. Vlăsceanu (1993) pointed out the link in Eastern and Central Europe between quality maintenance and processes of higher education reform, such as expansion and diversification. Lim (1999) observed that QA approaches must be modified to suit the conditions prevailing in developing countries, by being simple in design, modest in expectations and realistic in requirements.

From his survey of 24 countries, Frazer concluded "Some countries are adopting systems of external evaluation used by other countries in which the nature and degree of autonomy [of the HEIs] is quite different. The consequence for the former countries is confusion resulting from attempts to impose an inappropriate system." Frazer wondered to what extent external evaluation may undermine the actual or perceived autonomy of universities or faculties, and whether a unified system of external evaluation can be applied in countries that have institutions with different degrees of autonomy; these were issues for further consideration.

Billing and Thomas (2000a, b) reported on the experience of a project aimed at establishing the feasibility of introducing the UK quality assurance system in Turkish universities. There emerged significant cultural, structural, political and technical issues which affected the transfer of the UK system to the Turkish situation and which have wider implications for the international transferability of quality assurance and assessment systems between nations. Billing (2003) reported similar work in Bulgaria, and compared the situation and resulting issues with the project in Turkey. The main conclusion (from both studies) was that, given enough careful preparation through practically-based training (which promotes attitude change), awareness-raising and staff development, external QA frameworks are transferable at the level of aims, principles, concepts, style and approach. Provided that these are safeguarded, then there is considerable room for customisation of the actual details to meet local conditions, and indeed it is important that this should be done. Whether the resulting QA frameworks, after customisation, are sustained and effective has less to do with transferability itself, and much more to do with the client (i.e. government) having the necessary clarity of purpose and priorities, determination (and resources) to make changes and the continuity to carry them through. Billing and Temple (2001) offered a fairly pessimistic analysis of the ease of such change management in CEE countries. Georgieva (2000) also reported on the evaluation of three pilot institutional evaluations (based on UK institutional quality audit) in Bulgaria, where the audit visits were chaired

by myself, but otherwise the panels were entirely made up of Bulgarian peers. Although these audits were seen by all as very beneficial, she found problems within the universities in preparing for the external evaluations. The documents were descriptive rather than analytical. The participants had difficulty with the starting point for the evaluations, which was the HEI's own mission and goals (rather than a common external set of aims and priorities).

A international model of external quality assurance of higher education?

The increase of programmes run by institutions in other countries (including foreign campuses), and of students moving between countries for parts of their programmes, has stimulated the formation in the USA of GATE: the Global Alliance for Transnational Education. GATE certifies programmes, by invitation, based on 10 principles, self-evaluation, submission of a dossier of information, and a GATE panel visit (GATE 1997; see also McBurnie 2000).

Whitman (1993) reported the establishment by CEPES (European Centre for Higher Education) of a European Group on Academic Assessment, for exchange of information and experience; quality assurance schemes should be based on the three OECD principles of transparency, comparability and convertibility. Donaldson et al. (1995) reported the start of some European pilot projects at subject level, based on common guidelines; however, Thune's (1998) report on these gave little data on their effectiveness or any common principles.

Brennan et al. (1992), tried to construct and pilot (on Economics) a comparative method of subject-level quality assurance in Germany, the Netherlands and the UK. Their evaluation claims only partial success in applying a mixture of performance indicators and peer review using internationally mixed panels. The National Swedish Board for Universities and Colleges undertook an international review of business administration and economics programmes (NBUC 1992). The Dutch VSNU compared Electrical Engineering programmes in Belgium, Germany, the Netherlands, Sweden, Switzerland and the UK (Vroeijerstijn et al. 1992). The VSNU also co-ordinated in 1993 an international programme review in chemistry, and the same year an international review of physical education was undertaken by the Eidgenössische Technische Hochschule in Zürich (Vroeijerstijn 1995). ABET (Accreditation Board for Engineering and Technology, USA) and CHEPS (Centre for Higher Education Policy Studies, University of Twente, Utrecht) compared chemical, civil and mechanical engineering programmes in Belgium, France, Germany, the Netherlands and Switzerland (Goedegebuure et al. 1993).

There is no European or EU 'model' of quality assurance, and the nearest that these countries have got is the Bologna joint declaration of 30 Ministers of Education (EU 1999), which merely gives as an objective for the short term, and in any case the next decade: "Promotion of European co-operation in quality assurance with a view to develop comparable criteria and methodologies." While there have been further EU conferences and declarations on HE, most recently at Prague (2001), there is no evidence of the rhetoric producing any agreed pan-European model. For example, in the UK, the only reference in QAA publications is to participation in the Bologna and Prague processes enhancing the reputation of HE at home (QAA 2001). Haug and Tauch (2001) summarised the position in their Trends II report for the EFT:

There is a powerful movement towards more quality assurance (new agencies, ENQA network), but in very different ways: unclear relationship between "quality assurance" and "accreditation", applied to all or only part of the higher education system, focussing on programmes (sometimes along subject lines across a whole country) or on institutions, with different types of consequences. The development of "accreditation" is now more easily recognisable than in the Trends 1 report: many non EU/EEA countries have accreditation, and several others are considering the possibility or have firm plans for a new accreditation agency (separate from the quality assurance agency or combined with it). In some countries that wish to increase the international acceptance of their new degrees, accreditation is seen as a *sine qua non*. There is however still confusion about the benefits and the meaning of accreditation. The decentralised approach to quality assurance/accreditation (sometimes referred to as "meta accreditation") which is being experimented in one country may provide inspiration for European mechanisms based on mutual acceptance of quality assurance decisions, respecting national and subject differences and not overloading universities.

The CRE (Association of European Universities) has proposed, and piloted, an extra European level of institutional audit which would have deeper objectives than looking at quality assurance processes (QAA's remit in the UK); it would be a 'strategic evaluation' covering "governance, leadership, structural, normative and communication features" (Tabatoni 1996; van Vught and Westerheijden 1996). There would be four "basic ingredients: norms (including ethos and culture), vision and focus, balance, and strategic constraints." An appraisal of the CRE approach in 10 universities has begun (Kanan and Rovio-Johansson 1997). Amaral (1998) compared CRE's quality audits with the US accreditation system. On the US system's strengths and

weakness, Amaral quoted El-Khawas (1998). The strong points of the CRE method included its independence, supportiveness, and strategic level; its weaker points included lack of a regular follow-up system for evaluated institutions, and the problem of improving transparency and compatibility across EU Member States.

Conclusions

The several reported comparisons, show that a 'general model' of external QA does not completely apply in all countries, but they also show that most elements of it do apply in most countries. Some countries depart further than others from the model, for example Brennan and Shah (2000a) and Kells (1999) made much of the Mexican and Danish variations. A more useful conclusion, therefore, is that the van Vught and Westerheijden (1993) 'general model' provides a starting point from which to map deviations, and to which to relate them. In each country, there may be specific additions of elements or omissions from the model, but more usually there are modifications or extensions of elements rather than their omission. These variations are determined by practicalities, the size of the HE sector, the rigidity/flexibility of the legal expression of QA (or the absence of enshrinement in law), and the stage of development towards the 'Evaluative State' (Neave 1988); the latter convergence may be from two directions, starting at state control of the sector, or starting at a decentralised sector. The 'general model' can also be developed, by inclusion of some of the other fairly common features we have observed above, such as institution-level evaluations, the importance of QA systems internal to the HEI, and the use of performance measures.

So, if the 'general model' turns out to be a useful conceptual framework, perhaps it can be useful as a basis for transferring QA structures and processes to new contexts in countries starting on the road to international recognition of their HE sectors. This, indeed, seems to be supported by the work in CEE (European Training Foundation 1998), and by my findings above (Billing 1999), in which the conclusion was that, given enough careful preparation through practically-based training (which promotes attitude change), awareness-raising and staff development, external QA frameworks are transferable at the level of aims, principles, concepts, style and approach. Institutional-level evaluations, compared with programme-level accreditations, are expected to be more liberating and developmental, in empowering HEIs to become more self-regulating, innovative, responsible, and responsive to market needs (Billing and Temple 2001). But, following Kells (1999) work, caution should be applied in trying to apply the same type of QA system in countries with different cultures, although academic

cultures probably occupy a more compressed range of variation than wider social cultures. The extent of variation in HEI autonomy remains an important parameter of academic culture (Frazer 1997).

Note

1. Power distance is defined (Hofstede 1994; borrowing from Muller 1976) as “the extent to which the less powerful members of institutions and organizations within a country expect and accept that power is distributed unequally.”

Uncertainty avoidance is defined as the “extent to which the members of a culture feel threatened by uncertain or unknown situations”.

Masculinity attaches importance to issues such as: opportunity for high earnings; getting recognition deserved for doing a good job; opportunity for advancement to higher level jobs; having challenging work to do, giving a feeling of personal accomplishment. Femininity attaches importance to issues such as: good working relationship with manager; working with people who cooperate with one another; living in a desirable area; employment security.

“Individualism pertains to societies in which the ties between individuals are loose: everyone is expected to look after himself or herself and his or her immediate family. Collectivism as its opposite pertains to societies in which people from birth onwards are integrated into strong, cohesive ingroups, which throughout people’s lifetime continue to protect them in exchange for unquestioning loyalty” (Hofstede 1991). Hofstede found a rough inverse relationship between his Individualism index and the country’s economic index GNP/capita.

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