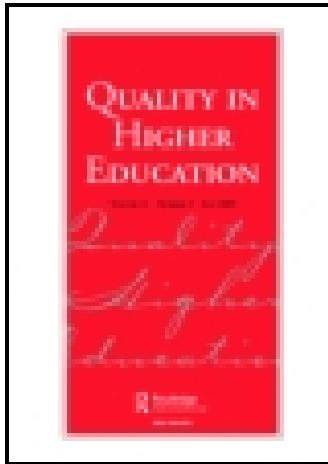


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Building European-level Quality Assurance Structures: Views from Within ENQA

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ABSTRACT *The current article discusses the changes in the role of the European Association for Quality Assurance in Higher Education (ENQA) in the Bologna Process, mainly from the ENQA point of view. This paper argues that ENQA's development to its current status as a European-level policy maker is to a great extent a result of the European Union's policy of supporting European-level cooperation and transparency in the field of quality assurance. ENQA was not the only contestant for the role it now has in European quality assurance. The European University Association (EUA) had long-term experience in quality assurance and also had its own interests in the field of quality assurance. The tension between ENQA and EUA is visible in the policy statements of these organisations and in interviews of past and current ENQA actors that were carried out for this study. In order to have a fuller picture of the development of European-level quality assurance structures, it is necessary to complement this study with further interviews from the point of view of other stakeholders, notably the EUA and the Commission of the European Union.*

Keywords: quality assurance; ENQA; Bologna Process

Introduction

The present article discusses the changes in the role of the European Association for Quality Assurance in Higher Education (ENQA)^[1] in the implementation of the Bologna Process, or the process aiming at creating a European Higher Education Area (EHEA). At the same time, it chronicles the development of ENQA into the role it now possesses in European quality assurance.

ENQA's role in the Bologna Process has been referred to in several articles (van der Wende & Westerheijden, 2001; Kohler, 2003; Harvey, 2004; Kauko, 2006; Keeling, 2006) but so far, systematic analyses of its development and role in European higher education policies and especially in the quality assurance policies are lacking. This article concentrates on the ENQA perspective. It is based on four interviews from previous and current ENQA steering

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group members and administration; and written sources such as policy statements and committee reports from the ENQA and the Bologna Process. The information from interviews and documents is compared against written documentation from the European Commission and the European University Association (EUA).

This study analyses the development of ENQA's role using Archer's (1994, pp. 9–11) definitions of the kinds of policy functions that international organisations have as:

- *policy instruments*, to be used to identify problems or to inform national debates, simultaneously enabling formal, diplomatic interaction between member states;
- *policy arenas*, providing a meeting place to discuss common interest, allowing for policy confrontations;
- *policy actors*, which take their place as entities in their own right, distinguishable from their member states.

This paper argues that, in Archer's (1994) terms:

1. ENQA has developed, over a relatively short period of time, from a policy arena of quality assurance agencies to a policy actor in European quality assurance and the Bologna Process.
2. The role of the European Commission has been and continues to be rather strong within ENQA and in the development of its role; the Commission gives funding and its representatives have regularly attended ENQA steering group meetings;
3. ENQA's development into a policy actor in quality assurance was not self-evident. Also the universities, through their European organisation, EUA and its predecessors, apparently had an interest in coordinating the European-level policy of quality assurance. This, according to interviews with former and current ENQA actors, caused tensions at some points during the development of the Bologna Process.

Founding of ENQA

According to interviewees and the analysis of the documents, there were two parallel developments in the early 1990s that led to the establishment of ENQA at the turn of the millennium.

First, the national quality assurance agencies had started to arrange unofficial meetings in the early and mid-1990s in order to exchange information and, quite practically, to get to know each other. In most European countries, the quality assurance agencies were first established in the late 1980s or early 1990s and these agencies were interested in establishing contacts with other agencies in order to exchange information and good practices:

Always once or twice a year some agency invited the others. Each agency paid its own expenses and the host organisation offered one dinner. And it was not, that is, we mainly compared each others' ways of doing things. (Interviewee B)^[2]

Was it about that time, when the... [national quality assurance organisation] was founded, this European cooperation between similar quality assurance organisations started to become firmer, and then in fact, we started to develop some kind of light network between these organisations, ...and, in the beginning the intention was that it was a kind of learning environment or a possibility to change experiences and to learn from each other. (Interviewee C)

Quite soon, however, the network members realised that the European Commission would support these kinds of activities. Some participants were not overly enthusiastic about Commission involvement in the activities of the network. On the other hand, the possibility of funding was appealing and the majority of the network was willing to take the risk.

...Was it around [nineteen] ninety-six. I can't be sure. Even ninety-nine is possible. But quite soon it started to take form... again, I can't say the exact year but I remember that we first discussed whether to write a funding application to the Commission. And that everyone else was enthusiastic but the Brits and Swedes leaned backwards 'no deal, we don't want the Commission here using power and meddling' but it did not take long, until it was realised that the funding we get is worth it. And nobody stayed outside... (Interviewee B)

The second track on the development of ENQA included European Commission action on quality assurance. The Commission had funded pilot projects in order to develop evaluation methods and to create shared features to national evaluations within some disciplines (engineering sciences, communication/information sciences, art and design) (European Commission, 1995). These pilot projects were initiated by the Council of Ministers of Education in 1991 as the Council gave a statement on improving the quality of higher education by complementing national experiences by increasing European cooperation. (European Commission, 1991)

These two parallel processes were stressed especially by Interviewee A who stated that, for the Commission, the goal was to create common outlines for the evaluations; for individual quality assurance organisations, it was to learn from each other:

...there were parallel tracks for a while, and really the whole thing begun in 1994 with the European Pilot Project, which was a Commission project, and there were, I forget how many countries there were? Nineteen? Twenty? Nineteen I think, something like that. Were involved in an attempt to develop an evaluation method, no, yes [hesitation] evaluation method, which would be appropriate for each country but would have some shared features. ... And at the same time, in parallel with that, a number of agencies had had informal meetings, largely after the Pilot Project, because they got to know each other there. (Interviewee A)

In September 1998, the European Council gave a recommendation on European cooperation in quality assurance in higher education (European Council, 1998). The European Council recommended that member states support or establish 'transparent quality assurance systems' and it described some features on which the quality assurance systems should be based. The Council also recommended that cooperation and networking should be promoted between quality assurance agencies. Both developments, the networking of quality assurance agencies and the European push, gave the final impetus to the founding of ENQA in March 2000, in a meeting hosted by the Commission. At which time it was known as the European Network for Quality Assurance in Higher Education (which is where the acronym comes from, which it has subsequently retained despite the later change of name). As an organisation, ENQA was first a project, funded by the Socrates programme of the European Union. When

it was made into an association in 2004, it took the new name of European Association for Quality Assurance in Higher Education.

The European Commission's role in the process of establishing ENQA was also mentioned by the interviewees. Though the agencies themselves had common activities, at least from the ENQA point of view, it was the Commission that 'pulled' the organisations together.

(Interviewer: You mentioned earlier the Council recommendation from 1998 and you said that in that recommendation, to start this kind of a network. Do you think there was this kind of a push from the ENQA or pull from the commission at that point?)

Well, I think at that stage it was both actually, and I think it was a [hesitation] there would have been that development anyway of some sort by the agencies, but this gave it the structure and the location and indeed the funding base, which was very useful, so it was the right thing at a right time I think, nobody argued about it.
(Interviewee A)

One interviewee estimated that as the European Commission came along and offered funding, the cooperation became more organised. Gradually, the membership criteria become stricter and, consequently, ENQA took a more exclusive turn from the original open network.

And already quite early these officials from the EU came along... And... [an EU official active in higher education] started to attend our meetings. He/she was a head of some DG in that time, ...and he/she started to propose that if we were better organised, then the EU would give us more funding. And we met six, eight, times in a year with EU support as a steering group and wrote our own regulations, and then became this official status, and then we wrote these criteria for membership, that is: what criteria should a quality assurance organisation fulfil in order to get the membership, and then in the course of time the criteria became stricter and now it is quite exact. One can say, that now the quality assurance organisations are accredited. (Interviewee C)

ENQA was not the first trans-national forum of quality assurance organisations. The International Network for Quality Assurance Agencies in Higher Education (INQAAHE) had been founded already in 1991 and, according to the interviewees, some of the persons who contributed actively in the establishment of ENQA were also active in INQAAHE. Both organisations have had similar activities such as creating criteria for good practices of quality assurance and supporting mutual recognition of quality assurance organisations (INQAAHE, 2007a; Woodhouse, 2007).

However, the interviewees stressed that ENQA has developed quite independently of INQAAHE.

The documents of INQAAHE indicate also that the regional quality assurance organisations have never been a structural element of INQAAHE but INQAAHE has supported regional cooperation of quality assurance organisations (INQAAHE, 2007b). Quality assurance organisations may have parallel memberships of both organisations and, since 2008, INQAAHE has made agreements with regional and thematic organisations about cooperation and division of tasks.

In some cases ENQA was active before INQAAHE: for example, it published its document about mutual recognition in 2003, whereas INQAAHE's respective document is from 2007. On the other hand, INQAAHE published the first version of its *Guidelines for Good Practice* in 2003, whereas ENQA produced, together with three other organisations, the first version of *Standards and Guidelines for Quality Assurance in European Higher Education Area* in 2005 (ENQA, 2009, p. 5).

The role of ENQA in the Bologna Process

The Bologna Process is not directly a European Union process but an intergovernmental development. It is, however, an indication of European harmonisation, or, as Huisman & van der Wende (2004) point out, the preferable politically correct term would be 'convergence', which was unthinkable some 10–15 years ago. It seems that while the efforts of the European Union were seen to intervene on the national policies in an inappropriate way in the early 1990s (European Commission, 1991; O'Callaghan, 1993), the 'voluntary' efforts at harmonisation by individual countries and their ministries of education were more acceptable. Keeling (2006) in fact suggests that many Bologna Process initiatives are "'mainstreaming" solutions first developed by the Commission'. In other words, while the European Union does not have a direct say in the education policies of the member states, policy changes may be initiated indirectly through the Bologna Process, with the support of the Commission. This would also seem to be the case with quality assurance (Keeling, 2006).

Around the preparation for the Prague meeting of 2001, the Bologna Process took more momentum. Some tensions between the different interest groups seemed to have surfaced during the preparation for the Prague meeting. Quality assurance was no longer presented as self-evidently accepted and the presence of different stakeholders was recognised more deliberately in the Prague background documentation than in earlier reports and declarations (Saarinen, 2005). These tensions were partly relieved by the introduction of new partners in the Process. Between the meetings in Prague (2001) and Berlin (2003), the number of participating partners and interest groups in the follow-up of the process increased significantly. The formal inclusion of ENQA in the process is one example of this development but also the EUA, the European Student Information Bureau (ESIB) and the European Association of Institutions in Higher Education (EURASHE) were introduced in the process in the Berlin meeting (2003).

Since the Prague conference, one of the key policy measures in the development of the EHEA was the development of comparable and transparent quality assurance systems. The new role of ENQA in this field was stated in the Communiqués of Prague (2001) and Berlin (2003). The Prague Communiqué mentioned ENQA as one of the potential contributors in developing the system of quality assurance, whereas the Berlin Communiqué gave ENQA the task of coordinating the creation of the *European Standards and Guidelines for Quality Assurance* in cooperation with the other three of the 'four E's': EUA, EURASHE and ESIB (now known as the European Students' Union (ESU)). Later, the Bergen Communiqué (2005) gave ENQA and the other members of the E4 a mandate to plan the implementation of a European register of quality assurance agencies.

Interviewee A especially stressed the rapid and also (at least from his/her point of view) unexpected change of ENQA's role. According to Interviewee A, at the beginning of the Bologna Process, quality assurance was not the main focus. However, this situation changed rapidly. This was also the time when the participants of ENQA started to discuss whether the network should move ahead and become a political actor instead of the discussion

forum it had been earlier (see Archer's, 1994, definitions of the functions of international organisations). According to Interviewee A, the mandate given in the Berlin Communiqué (2003) of coordinating the creation of the *Standards and Guidelines* came as a surprise to the ENQA steering group:

(Interviewer: Well, you mentioned that ENQA sort of popped up in the Berlin Communiqué surprisingly.)

It's still a puzzle to me. There must have been discussions in the Bologna follow-up group. But they were never communicated or discussed. There was never consultation with ENQA about any of this. But we were much excluded from the Bologna follow-up group. (Interviewee A)

This change in ENQA's role is visible in the reports and other documents published by ENQA over the years (see Appendix 1). During its first years, ENQA was screening the field of quality assurance and contributed to the mutual understanding between various quality assurance organisations. In the quieter years of the early 2000s, ENQA's publications contributed more clearly to the creation of the European Higher Education Area. In recent years, ENQA's publications have mainly focussed on common standards.

It appears that ENQA was given a central role in planning the standards and guidelines of quality assurance even though it did not actively seek this position. This conclusion is naturally based mostly on the ENQA view in this article but the analysis of the Bologna Process and Commission documents supports it. EUA, on the other hand, which actively promoted that universities and their organisation should get this role, did not reach this position.

According to one of ENQA based interviewees, one reason for choosing ENQA for this role may be that the ministers and ministries were much more familiar with ENQA and the national quality assurance organisations than with the European University Association. The interviewees stressed its close contacts with ministries and the European Commission. ENQA and the member quality assurance organisations had been producing information for policy makers and also receiving funding from them. It appears that ENQA and its member organisations, at least as seen from the inside, had closer contacts with the ministries than universities and their European association EUA:

The quality assurance agencies, or similar organisations, they are funded by ministries. And their independence, it varies. Independence is always emphasised but if the state gives the funding, then—what is independence? But, it can be said that the ministries considered the quality assurance agencies as their own children. If you

TABLE 1. Classification of ENQA publications in 2001–2007

	2001	2002	2003	2004	2005	2006	2007	Total
1. Analyses and/or descriptions of QA systems	4		1	1		1	1	8
2. Common standards, mutual recognition		2			2	2	4	10
3. Analyses/standards of discipline-based QA				1		1		2
Total	4	2	1	2	2	4	5	20

Source: www.enqa.eu. See Appendix 1 for the list of publications and their categorisation.

think about national quality assurance organisations, they do produce information especially for the national policy decisions. In this sense, the national interests of different countries, the minister's interests, it is quite evident. And in this respect the EUA, which is more unknown to ministers and they are not so familiar with it, it is more distant to them. (Interviewee C)

One interviewee also felt that from the point of view of the national ministries of education, quality assurance organisations were seen as more independent from universities than the EUA, which, at least from the ENQA perspective, represent the interests of its member universities:

Before ENQA, it was EUA that had, it was a kind of [hesitation] quality, it had a profile as a higher education quality expert. But it was the universities' organisation. And ENQA was considered to be more independent and to represent the interests of national and independent quality assurance organisations. So it was politically easier to give ENQA this kind of role. (Interviewee D)

The role of the European Commission

Because the European Commission's incentives have had an essential impact in the founding and development of ENQA, it is reasonable to ask, whether ENQA is an independent actor, or whether it has been the Commission's tool in the field of quality assurance. Some of the interviewees admitted openly that the Commission had its own motivations when it supported ENQA and that ENQA served, in the words of interviewees, as 'a kind of building block' or 'tool' in construing European Commission's policy goals of higher education:

(Interviewer: Do you have any idea about, why did the role of EU grow. What was their motivation, their interest in [ENQA's] activities?)

Maybe, in a way, well yes, especially [an EU official active in higher education] is clever in that way that he/she doesn't reveal all the motivations but they do have this very strong motivation of creating a European policy of higher education. And now, when he/she links together all these, the Bologna Process, reform of degrees, international cooperation and evaluations and all other things very easily, and these are the elements, which are used in building it. And this [i.e. ENQA, writers comment] is a kind of building block in guaranteeing the level of European higher education. (Interviewee C)

...all the time the role of quality has become more and more important in the Bologna Process. And the role of ENQA has been, sort of, seen from this point of view; that ENQA could be a good tool in developing European quality. The biggest source of ENQA's funding has been the European Commission, the Directorate for Education and Culture... Naturally, when the Commission funded with quite big amounts of money, or big [hesitation] but funded, anyway, and it had its own motives. But operationally we were quite independent, sure ENQA still is, but the funding came from there. (Interviewee D)

Both interviewees appear to suggest that though the Commission did not directly intervene in the operations of ENQA, its support to ENQA was an essential element of the

Commission's way of steering the field of higher education towards European Higher Education Area. The interviews cited above indicate also a feeling of being financially dependent of the Commission. It was probably for this reason that some of the interviewees considered that ENQA should raise its membership fees, in order to diminish the Commission's financial influence:

...one of the policy directions I've been trying to pursue is trying to move ENQA away from dependence on funding from the Commission, because so long as we are heavily dependent on the Commission for funding, it's very difficult to strike an independent, entirely independent policy line which the Commission... I mean they're not *bad*, they don't interfere but they're there, they're on the committee, and they always turn up and they have views on things, so I'd much rather be entirely independent from the Commission, but that means putting our membership fees up, ... (Interviewee A)

(Interviewer: ...did you have any unofficial scenarios about what might go in a good direction or how things could go wrong...?)

My only worry... was all the time, how much the Commission was intending to steer the decision making in ENQA. ...the Commission paid the salaries, financed the rent of our office, all these expenses. ...And that, in a way, how much Commission would steer our activities. I was often thinking about that. (Interviewee D)

Dale (2006) suggests that European Union policy in general is based on a 'construction of a consensual best practise', which is done by dialogue among policy makers and experts, peer-learning activities, indicators, benchmarks, reports and analyses. (European Commission, 2007a). If this is true of higher education also, it would indicate that the European Commission has not been interested in the actual contents of quality assurance issues, as long as ENQA has supported the larger European issues of developing transparency, comparability and other European quality assurance policy meta-level goals.

Keeling (2006) suggests that many of the Bologna Process initiatives are "'mainstreaming" solutions first developed by the Commission'. In other words, many of the Bologna Process reforms have their origin in the European Commission's policies. As seen from the above, this is certainly true of the quality assurance developments of the process. The Commission also provided start-up funding for the European register of quality assurance agencies (European Commission, 2007b); in fact, the register was recommended in February 2006 in a Council recommendation (European Commission, 2006). The Commission is the only non-state member of the process, as well as a full member in the Bologna Follow-Up Group (BFUG). The weight of the Commission seems to be far greater than the principle of subsidiarity would suggest.

The European register of quality assurance agencies—but on whose terms?

Some of the interviewees stressed that so far, and as seen from ENQA's side, the most difficult policy issue for ENQA has been the question of the register of quality assurance agencies. They also felt that ENQA's strongest rival in this topic was the European University Association.

The tensions between ENQA and EUA became visible in the early 2000s when ENQA stressed the importance of independent quality assurance organisations whereas EUA

emphasised the role of a European forum, consisting of various stakeholders, especially universities. The Salamanca declaration of the EUA (2001) was quite cautious in its formulations. It stressed respect for national, linguistic and discipline differences and stated that the quality assurance should not be based on a single agency enforcing a common set of standards.

On the other hand, in the conclusions of the work of thematic groups it was suggested that 'some kind of European platform or clearing system need to be organised with the full support of higher education institutions in order to disseminate good practice and advise accrediting bodies on appropriate procedures' (EUA, 2001). In other words, the universities should have some kind of a direct or indirect role in defining good practices and appropriate procedures in quality assurance. The Graz declaration of EUA (2003) developed this idea further, stating that stakeholders and, in particular, universities should collaborate to establish a provisional Higher Education Quality Committee for Europe. Among other tasks, this committee should 'monitor the application of a proposed code of principles, developing a true European dimension in quality assurance'.

In its statement of 2001, ENQA manifested quite strong suspicions towards the idea of a European Quality Committee. According to this statement, this kind of platform probably would not be able to take care of practical tasks, like monitoring pilot projects. In addition, ENQA was suspicious about its close contact to one stakeholder group:

However, the steering group recommends that great care be taken in the composition of such a platform. On the one hand, it is doubtful whether a very diversified platform composed of members with divergent basic interests could realistically be expected to proceed towards more operational solutions, including pilot projects. On the other hand, the steering group does not believe that a platform should be the responsibility of only one of the participants, so that there can be no reason to distrust the credibility of the outcome from the start. (ENQA, 2001, p. 4)

ENQA's suspicions towards the intentions of EUA also became visible during the interviews. According to one ENQA-based interviewee, ENQA preferred mutual acceptance of quality assurance organisations, whereas EUA was promoting an external organisation that would monitor the work of quality assurance organisations. According to Interviewee A, this reflects the unofficial policy goal of EUA to control the quality assurance agencies. From the point of view of ENQA, this seemed unacceptable:

And the register had two starting points, one of them was ENQA itself and there was a conference in Sitges, in 2003, I guess, called 'Taking our own medicine', which was an ENQA conference about, a workshop about how to, how agencies should quality assure their own work. And after that came the idea that there should be regular reviews of agencies by external bodies. The parallel with that though, the EUA, which was trying to control agencies, because part of EUA's unwritten agenda has been to control quality assurance agencies. They set up, or they, they stated an intention to set up a quality committee, part of whose function would be to have general discussions about quality and quality assurance. And ENQA might have been involved in that, invited member. But part of it was also to decide which were good and which were bad agencies. (Interviewee A)

On the other hand, ENQA shared the idea of having some kind of exclusive system of credible quality assurance agencies. ENQA stated that it already functioned as a kind of

gatekeeper but admitted that other stakeholders should not be excluded from this process. As a first step, ENQA proposed a mutual recognition of quality assurance systems. This reflected ENQA's view that quality assurance should be based on strong independent quality assurance agencies and that mutual peer reviews should guarantee their credibility (ENQA, 2001). In its statement to the Berlin Conference, ENQA accepted the idea of a register but proposed that ENQA should build this register and that ENQA and the register should have membership criteria as identical as possible (ENQA, 2003).

The *European Standards and Guidelines for Quality Assurance* (ENQA, 2009) presented a compromise that included both ENQA's and EUA's policy goals. According to it, the system would include a peer-review system for quality assurance agencies and a register of external quality assurance agencies operating in Europe, including a European register committee. The Bergen meeting (2005) discussed the *Standards and Guidelines* and consequently gave ENQA and the other members of the E4 a mandate for planning the implementation of the register.

According to one interviewee, during the register negotiations, ENQA's policy goal was that membership in ENQA should automatically guarantee entrance to the register. The EUA (2007), in turn, stressed that the register committee must have the authority of their decisions even though they may use the reviews of ENQA or other quality assurance organisations. This caused difficult negotiations because, in addition to being an expert organisation, ENQA was also representing its membership body and also its own interests. Later, however, the ENQA board moved from their original position and accepted the idea that if the register were to be independent, its membership cannot be tied to ENQA membership.

And the key ways in which the members' interests have to be protected is as far as possible to ensure that membership of ENQA carries with it as near automatic as possible entry into the register. Because one very good reason; because the criteria for register and ENQA membership are identical. Because ENQA requires a review before you'll get it and so does the register. And one thing I was not prepared to tolerate was for there to be two parallel organisations, each separately requiring a review. ...Now I understand why the register cannot automatically accept somebody because it would then be accepting another body's judgements. But given the register is NOT going to be in the position to be able to carry out its own reviews, then it is going to rely quite heavily on ENQA and to provide the information on which it's going to make its decision,... (Interviewee A)

As the *European Quality Assurance Register for Higher Education* (EQAR) was founded in March 2008 by ENQA, EUA, EURASHE and ESU, it would seem that the expectations presented by Interviewee A in the previous excerpt came true. The Register is independent but since inclusion in it is 'based on compliance with the *European Standards and Guidelines*' (EQAR, 2008a), it is obvious that ENQA members will have no problem in entering it.^[3]

ENQA contributes directly and indirectly to the process of choosing the members of the Register, because the reviews of national agencies will be organised either nationally (including reviews conducted for an ENQA membership), or by a non-national body (such as ENQA), in cases where a national review is for some reason not possible.

In addition, the committee accepting the applicants for the Register will consist of representatives of the E4 (including ENQA), Business Europe and Education International. Additional representatives of the Bologna Follow-up Group will act as observers.

The EQAR started its activities in summer 2008. According to its web-pages, it is anticipated that the Register, containing the first round of quality assurance agencies that have applied successfully for inclusion, will be published in early December 2008 (EQAR 2008b).

Conclusions

In the course of the Bologna Process, ENQA gradually got a more active role in the field of European quality assurance policy. This is evident from the analysis of the various policy documents by the Bologna Process but it is also visible in the views of ENQA interviewees. The new role of ENQA was stated in the Communiqués of Prague (2001) and Berlin (2003). The Prague Communiqué (2001) mentioned ENQA as one of the potential contributors in developing the system of quality assurance whereas the Berlin Communiqué (2003) gave ENQA the task of coordinating the creation of *European Standards and Guidelines for Quality Assurance* in cooperation with the European University Association (EUA), European Association of Institutions in Higher Education (EURASHE) and European Student Information Bureau (ESIB). Later, the Bergen communiqué (2005) gave ENQA and the other members of E4 a mandate for planning the implementation of what became the *European Quality Assurance Register*.

ENQA was, however, not the only option when the ministers in the Berlin conference chose the coordinator for the creation of *European Standards and Guidelines*. Also the universities, through their European organisation EUA and its predecessors, had experience in the field of quality assurance and had interest in coordinating the European level policy of quality assurance. This caused tension between ENQA and EUA, which is evident not only in the light of interviews with current and former ENQA actors but is also visible in the written policy statements of EUA and ENQA.

Since the early 1990s, the European Community has had as a policy goal supporting European-level cooperation between quality assurance organisations and this has had an essential impact in the development of ENQA. The European Commission has given financial support to ENQA and high-level European Union officials have participated in the meetings of the steering group of ENQA. The interviewees were aware of the role of the European Union but considered that, at least from their point of view, the Commission had so far not tried to steer ENQA's activities. On the other hand, some interviewees were worried about the essential and gradually growing role of the European Union.

The interviewees estimated that ENQA's position has become quite strong. From ENQA's point of view and as suggested by documents that were analysed, three factors have supported this development.

First, ENQA represents quality assurance organisations, which are usually funded by governments and are more dependent on the political will of governments than universities. Due to this the quality assurance agencies and ENQA are more familiar to the ministries of education than the EUA, which represents European universities.

Second, since the mid 1990s, the European Commission has supported ENQA's activities and ENQA's current role in the Bologna Process can be seen as a part of a continuum in this respect.

The third, and more speculative explanation, is that ENQA is a part of a system of balances and counter balances between national governments and universities. Since the Salamanca declaration in 2001, the EUA has proposed systems where the universities have a central role in coordinating the European structures of quality assurance. The Commission and the Bologna ministers, however, did not give the universities this role but, instead, chose to make

ENQA's role stronger. The ministers gave ENQA the task of coordinating the planning of the Register, together with other relevant stakeholder groups. However, ENQA or its members were not given a gatekeeper's role in the field of quality assurance.

The debate about the *Register of European Quality Assurance Agencies* indicates that ENQA has grown to the limits of its power. It would be useful, however, to complement the data analysed in this article with other interviews, especially from the EUA and the Commission, in order to gain a fuller picture the development of the European-level structures in the field of quality assurance during the Bologna Process.

Notes

- [1] From 2000 to 2004 the acronym ENQA stood for 'The European Network for Quality Assurance'. From 2004 it stands for 'The European Association for Quality Assurance in Higher Education'.
- [2] Interview A took place in English; extracts from interviews B, C and D are our own translations.
- [3] Editor's note: the *European Standards and Guidelines* were not originally designed as a compliance document; they were guidelines with suggested standards to aid agencies in their processes. The assumption that ENQA members will have no problem in entering the Register has not been the case in practice.

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Appendix 1. ENQA's publications 2001–2007

Categories:

- 1 Analyses and/or descriptions of QA systems
- 2 Common standards, mutual recognition
- 3 Analyses/standards of discipline based QA

Year	Name	Category	Motivations for the categorisation
2001	International Initiatives and Trends in Quality Assurance for European Higher Education	1	The report provides an outline of the international and European context in which the newly established ENQA will operate.
2001	Quality Assurance in the Nordic Higher Education - accreditation-like practices	1	
2001	Quality Assurance Implications of New Forms of Higher Education	1	
2001	Institutional Evaluations in Europe (workshop report)	1	
2002	A Method for Mutual Recognition	2	
2002	Quality Procedures in European Higher Education	2	Though this publication describes the QA systems in European Countries, it aims at providing information for the creation of 'Standards and Guidelines for Quality Assurance'.
2003	Benchmarking in the improvement of Higher Education (Workshop report)	1	This report discusses both benchmarking in general, benchmarking as a tool for educational development and as a tool for quality assurance. Due to the diversity of topics it is categorised as 'analyses and/or descriptions'.
2004	Transnational European Evaluation Project (TEEP)—Methodological Report	3	
2004	Accreditation Models in Higher Education (Workshop report) (1)	1	
2005	Standards and Guidelines for Quality Assurance in the European Higher Education Area (2)	2	
2005	Quality Convergence Study. A contribution to the debates on quality an convergence in European Higher Education Area. (2)	2	This report is a follow up to the report 'Quality Procedures in European Higher Education' of 2002 and is thus linked to the creation of the <i>Standards and Guidelines</i>
2006	Mapping External Quality Assurance in Central and Eastern Europe	2	The report presents the results of CEEN member surveys that charted how far the member agencies matched up to the good practice described in the <i>Standards and Guidelines</i> .
2006	Transnational European Evaluation Project II (TEEP II)—Methodological Report	3	

Year	Name	Category	Motivations for the categorisation
2006	Quality Assurance of Higher Education in Portugal	2	Results of an international experts panel appointed by ENQA which reviewed the existing Portuguese quality assurance practices and gave recommendations to the Portuguese government on the organisation, processes and methods of establishment of a national accreditation system which would meet the European Standards and Guidelines for Quality Assurance.
2006	Guidelines for national reviews of ENQA member agencies	2	
2007	European Standards and Guidelines in a Nordic Perspective	2	
2007	Terminology of quality assurance: towards shared European values?	2	The publication includes two thematically related reports: the workshop report on the Language of the European Quality Assurance and the final report of the second Quality Convergence Study (QCS II). Especially the second report is linked to the 'European Standards and Guidelines'.
2007	Report to the London Conference of Ministers on a European Register of Quality Assurance Agencies	2	
2007	Student involvement in the processes of quality assurance agencies (Workshop report)	1	This report aims mainly at sharing information about student involvement, though the 'Standards and Guidelines' and the Bologna process is also mentioned in the introduction of the report.
2007	External review report of NVAO	2	