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SURVEY OF INTERNAL QUALITY ASSURANCE SYSTEMS

Comparative study for WP5 of IBAR project

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INTRODUCTION

Countries of the EU have had different history and different traditions in their Higher Education. Although the transnational contacts between HEIs have been present and appreciated since Middle Ages, only for the last few decades they have become systematic, with the introduction of European mobility schemes and cooperation programmes, Erasmus (1987), now part of the LLP programme, being the champion among them. With its record of near 3 million students having been exchanged it has also been one of the first drivers to develop a common understanding of quality of studies for the sake of facilitating the recognition of study periods abroad. “ERASMUS has been, and continues to be, a driver for change in European higher education”. Cooperation programmes also practically help develop common understanding of quality of studies through joint projects on curriculum development. Creation and expansion of the EU with its high degree of integration of economies and labour markets is another strong driver for common quality standards in HE, especially if one follows a widely used definition of the quality of services as meeting the needs of clients, the employers being the main customer for the ‘products’ of HE. Likewise the student population as a client has time and again expressed the need for higher quality standards – in some countries quite violently – confirming similar definitions of quality like fitness for use (Juran, 1974) or conformance to requirements (“…Quality means conformance to requirements, not goodness…” Crosby, 1979).

Nationally organized HE Quality assurance systems in Europe emerged under pressure of societies for greater accountability of HEIs and were pioneered by UK, The Netherlands and Denmark.

A strong push towards establishing national quality assurance systems was the adoption of the Lisbon Recognition Convention in 1997 which based the mutual recognition of qualifications on the mutual trust among the HE systems. It was largely understood that establishing such trust should be based on reliable quality assurance in all the countries – parties of the Lisbon recognition Convention, which facilitated creation or development of external quality assurance systems in some countries. Even more powerful facilitator of quality assurance is the Bologna process – starting with the Bologna declaration itself in which the ministers responsible for higher education have included quality assurance among the main Bologna Process action lines as: “Promotion of European co-operation in quality assurance with a view to developing comparable criteria and methodologies”.


The stimulus was strong, but thus far, however, the main emphasis was put on the external quality assurance mechanisms only and resulted, inter alias, in establishing in 2000 of ENQA – European Association for Quality Assurance in Higher Education (initially European Network of Quality Assurance in Higher Education). Its mission is „to act as a major driving force for the development of quality assurance across all the Bologna signatory countries”\(^6\).

When the ‘Bologna’ ministers at their conference in Berlin in 2003 were discussing further developments of quality assurance, European universities were those that reminded that any quality of higher education is created inside the universities and that European universities are ready to take up the task of establishing internal quality assurance mechanisms within HEIs. Ministers in Berlin therefore stressed that „consistent with the principle of institutional autonomy, the primary responsibility for quality assurance in higher education lies with each institution itself and this provides the basis for real accountability of the academic system within the national quality framework”\(^7\). They also called on ENQA, European University Association (EUA), European Association of Institutions in Higher Education (EURASHE) and European Student Information Bureau (ESIB) (now European Student Union - ESU) „to develop an agreed set of standards, procedures and guidelines on quality assurance, to explore ways of ensuring an adequate peer review system for quality assurance and/or accreditation agencies or bodies, and to report back through the Follow-up Group to Ministers in 2005”\(^8\), nowadays known as Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). ESG do not try to add one more short definition of quality to 20 or more already existing ones, but rather orient us in the direction to achieve it. It is now 6 years since ESG have been adopted by ministers in Bergen.

The implementation of ESG in the external quality assurance has advanced rather well though still with distortions in some countries, mainly those where the historical traditions are based on direct state control on higher education. Currently compliance of national quality assurance agency with ESG is the main criterion for the inclusion of national QA agencies in the European Quality Assurance Register (EQAR) as well as their ENQA membership. This hopefully is a powerful tool for implementation of ESG in the external quality assurance. It is not that simple with regard to internal quality assurance and accordingly fulfillment of the Part 1 of the ESG in higher education institution. On one hand, policies of higher education still remain the undisputable domain of each country, and on the other hand, universities are autonomous and in majority of countries can establish quality assurance systems in the way they like. Therefore, European instruments can only help in development of common understanding or common practice but cannot serve as the legal requirement for creating common standards. The abovementioned is not specific to internal quality assurance alone but rather it is common to all those Bologna objectives which need efforts inside HEIs, such as implementation of learning outcomes, using recognition criteria according to the Lisbon Convention, introducing recognition of prior learning and others.

Thus ESG developed 6 years ago and being the main source of reference for our project claim to be only providing assistance and guidance to HEIs in developing their internal quality assurance systems and to agencies undertaking external quality evaluation, but they do not intend to be
prescriptive or unchangeable. So one should not be surprised by the fact that even to this date regarding the Part 1 of the ESG we cannot confirm the ESG as being the common reference across Europe.

Rather, we should appreciate how much in common we find comparing the situation and the trends in different countries and different institutions and how much the principles put forward in ESG have been implemented in quality management of studies although without an explicit reference to them.

Two decades ago the starting positions of the consortium member countries have been rather different. UK and NL had had a long history of development of autonomy of higher education institutions and quality culture based on it. PT, after shaking off the dictatorship in seventies, had also had quite a long period for development of autonomous HE system. PL, CZ+SK and LV had been under strict governmental regulation until the fall of Berlin wall (LV until 1991) and conforming to the HE system of the Soviet Union. Only after regaining the real National independence of the countries and with getting access to European cooperation programmes such as Tempus and later Socrates/Erasmus, the HEIs could pick up the prewar democratic traditions and cross-breed them with the modern developments in Western Europe of early nineties. The last 2 decades, due to the factors mentioned above, have considerably changed the situation in a convergent mode, and now, although there are still certain differences from country to country we can find in them increasingly more common practices, e.g., similar facilitating factors and similar barriers to implementation of ESG.

**SOURCES OF INFORMATION AND METHODOLOGY**

The IBAR project focuses on investigation of barriers and examples of good practice in ESG implementation in 7 European countries: CZ, LV, NL, PL, PT, SK and UK. Each of the 7 countries had to select 4 HEIs for this study; as with a sample of 4 it is not easy to cover all the possible varieties – large and small institutions, comprehensive and specialized, public and private, old and new ones, it was decided in the kick-off seminar of the project to use 2 of the parameters as compulsory, viz., the size (large vs. small institutions) and profile (comprehensive vs. narrowly specialized institutions). The individual institutions selected for the survey in every country are as follows:

<table>
<thead>
<tr>
<th>Name</th>
<th>Country</th>
<th>Type</th>
<th>Size</th>
<th>Profile</th>
</tr>
</thead>
<tbody>
<tr>
<td>Institute of Chemical Technology in Prague (ICTP)</td>
<td>CZ</td>
<td>public</td>
<td>small</td>
<td>specialised</td>
</tr>
<tr>
<td>Palacký University in Olomouc (PUO)</td>
<td>CZ</td>
<td>public</td>
<td>large</td>
<td>comprehensive</td>
</tr>
<tr>
<td>Brno University of Technology (BUT)</td>
<td>CZ</td>
<td>public</td>
<td>large</td>
<td>specialised</td>
</tr>
<tr>
<td>University of Finance</td>
<td>CZ</td>
<td>private</td>
<td>small</td>
<td>specialised</td>
</tr>
<tr>
<td>Institution</td>
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<tr>
<td>and Administration (UFA)</td>
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<td></td>
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</tr>
<tr>
<td>University of Latvia</td>
<td>LV</td>
<td>public</td>
<td>large</td>
<td>comprehensive</td>
</tr>
<tr>
<td>Business school „Turība”</td>
<td>LV</td>
<td>private</td>
<td>medium</td>
<td>specialised – business profile</td>
</tr>
<tr>
<td>Latvian Maritime Academy</td>
<td>LV</td>
<td>public</td>
<td>small</td>
<td>specialised – technical profile</td>
</tr>
<tr>
<td>Rezekne Higher School</td>
<td>LV</td>
<td>public</td>
<td>small</td>
<td>comprehensive</td>
</tr>
<tr>
<td>University A</td>
<td>NL</td>
<td>public</td>
<td>small</td>
<td>comprehensive</td>
</tr>
<tr>
<td>University of Applied Science B</td>
<td>NL</td>
<td>public</td>
<td>small</td>
<td>specialised – technical profile</td>
</tr>
<tr>
<td>University of Applied Science D</td>
<td>NL</td>
<td>public</td>
<td>large</td>
<td>specialised – technical profile</td>
</tr>
<tr>
<td>Szkoła Główna Handlowa w Warszawie (Warsaw School of Economics) [SGH/WSE]</td>
<td>PL</td>
<td>public</td>
<td>medium</td>
<td>Specialised – economic profile</td>
</tr>
<tr>
<td>Uniwersytet Adama Mickiewicza w Poznaniu (Adam Mickiewicz University) [UAM/AMU]</td>
<td>PL</td>
<td>public</td>
<td>large</td>
<td>comprehensive</td>
</tr>
<tr>
<td>Politechnika Łódzka (Technical University of Lodz) [PL/TUL]</td>
<td>PL</td>
<td>public</td>
<td>large</td>
<td>specialised – technical profile</td>
</tr>
<tr>
<td>Bielska Wyższa Szkoła im. J. Tyszkiewicza w Bielsku-Białej [BWS]</td>
<td>PL</td>
<td>private</td>
<td>small</td>
<td>comprehensive</td>
</tr>
<tr>
<td>HEI α</td>
<td>PT</td>
<td>public</td>
<td>small</td>
<td>comprehensive</td>
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<tr>
<td>HEI β</td>
<td>PT</td>
<td>public</td>
<td>large</td>
<td>comprehensive</td>
</tr>
<tr>
<td>HEI γ</td>
<td>PT</td>
<td>public</td>
<td>small</td>
<td>specialised – technical profile</td>
</tr>
<tr>
<td>HEI δ</td>
<td>PT</td>
<td>public</td>
<td>small</td>
<td>specialised – technical profile</td>
</tr>
<tr>
<td>Constantine the Philosopher University in Nitra</td>
<td>SK</td>
<td>public</td>
<td>medium</td>
<td>comprehensive</td>
</tr>
<tr>
<td>The University of Žilina</td>
<td>SK</td>
<td>public</td>
<td>medium</td>
<td>comprehensive</td>
</tr>
</tbody>
</table>
The initial idea for this work package was to only examine the policy papers available publicly. However it turned useful to enter into direct contacts with and conduct interviews at the central management level to obtain more concrete information and to clarify certain quality-related issues not treated in policy documents in a sufficient amount of detail. Also it turned out that to have a full coverage of institutional quality policy as it is understood in ESG, one has to consider a wide variety of documents ranging from development strategies and quality handbooks to annual work plans and activity reports of specific departments. To better understand the institutional policies, it also turned necessary to refer to the National policies and regulations so as to see what exactly the institutions are free to define by themselves and what is done according to Law. Thus some of the National reports contain information not only on policy as defined at the institutional level but also some reference to the requirements at National level and some evidence about implementation of the policies from activity reports.

The source of information for the joint report was almost only the National reports, with just some background information from European sources. When evaluating the available information concerning the research questions, the initial idea was to quantify the results in a binary system (0 or1); in the course of analysis it turned out, however, that the picture mostly is somewhat blurred, and the answers are not discreet ‘yes’ or ‘no’ but somewhere in between, or rather ‘yes’ with some comments or reservations. And, anyway, one has to make reservations due to the fact that the chosen sample, strictly speaking, is far from being representative and the findings and conclusions of this research are rather an illustration of the situation not a sound evidence-based judgment.
FINDINGS FROM THE RESEARCH QUESTIONS OF WP5

1. Is there an institutional quality assurance policy in place? If not, why?

In most cases National legislation does not explicitly prescribe creation of internal quality assurance policies, although in all the participating countries there are certain legal requirements which would be impossible to fulfill without any institutional quality policy at all. According to the National surveys in CZ and NL there are legal requirements to create an internal quality assurance system; also in UK there is a requirement to establish a quality ‘framework’ (not ‘policy’); in PT in the new legal framework (since 2009) there is an indication that HEIs are responsible for developing their quality assurance systems (it is not clear to what extent they should refer to ESG which is said to be in the basis of National accreditation policy). Only in NL and SK there is an explicit reference to ESG at the level of National legislation. After adoption of the latest amendments to the Law on HEIs in PL in January 2011 and LV in July 2011, it can be expected that institutional quality policies will be also orienting to ESG more directly. In all countries under survey National legislative acts prescribe adoption of the Constitution or Statute of the institution, and in most cases also a development strategy. As these are subject to certain standards and in some countries they have to go through an adoption process in the Parliament or in the Government, they necessarily include chapters on academic quality; so even if there is no direct requirement for that, the institutions are implicitly driven to develop a kind of quality policy. Furthermore, the system of accreditation that is present in all the surveyed countries foresee self-evaluation and external evaluation by [foreign] academic experts, and in the requirements for these evaluations questions from ESG are included. So although the internal quality assurance policy cannot always be found as a separate document, it can be judged upon in all the cases as part of overall functioning and development strategy or development plan. Among the quality criteria one can always find the academic results, although only recently the institutions are attempting to directly derive them from learning outcomes as described in Bologna documents. Qualification of staff and the situation with learning resources (including equipment where appropriate), is an integral part of evaluations for accreditation, and therefore they are also included in internal policy documents. In most cases the documents concerning internal quality assurance policy are available publicly, however they are usually only in the National language, not translated to major EU languages. So most of the elements suggested in ESG are present in the internal policy or in internal normative documentation, but only very seldom there is an explicit reference to ESG in institutional policy documents. It has to be emphasized, however, that here we are only speaking about the setup of quality policy at institutional level, not its actual implementation that will be dealt with in work packages 6 to 12.
2. How does the policy involve the organization of the quality assurance system?

Although in some participating countries (LV, PL) creation of an internal quality assurance system has not been directly required by National legislation until recent amendments to the Law (2011), all the surveyed institutions have set up their Quality Assurance or Quality Management systems (QAS or QMS). Some of these systems have been certified by external QM firms, some have been recognized at national level, some adopted by governing bodies of the institutions. For larger institutions where creation of a comprehensive QMS might turn out a very cumbersome task, there is a system for development and regular revision of curriculum, including all or most of the elements suggested by ESG. In smaller institutions the responsibility lies with the Rector’s office, in larger institutions there is an academic department or quality management unit that maintains the system at the institutional level and organizes regular quality audits. In a few cases one can observe a system developed at Faculty level. QMS have been created either by international standards (e.g., ISO 9001: 2008) or based on standards existing in specific branches of economy or according to patterns developed by National QA agencies. QMS or QAS system is coordinated at the central management level, but there are variations about who is the responsible person, depending on the size of the institution and the national and institutional traditions. Typical examples are: Vice-rector for academic affairs (CZ, LV, PL), Quality Management/Assurance Unit/Department/Team (CZ, LV, PL, UK), Academic Department (LV), Education Centre (NL), Office for the Evaluation and Promotion of Institutional Quality (PT).

3. How does the policy involve the responsibilities of departments, faculties and other organizational units?

In the cases when a QMS system has been developed according to an International standard (such as ISO 9000), the responsibilities have been elaborately described in the QMS (along with the respective processes) and they include all levels from the central units down to faculties/departments/chairs responsible for particular disciplines. The responsibilities are further confirmed in respective internal regulations (on the Academic department, on the studies, on the Promotion Councils, on the Student Self-Government, on the State exams etc.); this is also present in the few institutions where a concise QMS system has not been developed. The ultimate responsibility for the quality of study programmes (according to descriptions of processes and/or the Constitutional acts of the institutions) is fixed at the level of management of study programmes (the Director of the study programme, the Dean or Vice-Dean, the Academic board – the specific names and arrangements depend on the National and institutional traditions, and we can find some variations on the theme). At this stage we have not reached down to interviews of academic staff and we cannot describe to what extent one can find responsibilities of staff members for quality of their academic work, but we have evidence that – at least as concerns the internal regulatory documents – quality of academic work is in all cases one of the main criteria at recruitment and reelection of academic staff.
4. How does the policy address the involvement of students? If not, why?

Representation of students in decision-making and governing bodies at all levels of the institutions is a compulsory requirement fixed in the Constitutional act or Statute of the institutions. In the institutions under this survey we did not find any deviations from full membership, and where the students are present, they always have a full vote. In all the institutions students are involved in adoption of self-evaluation reports, but it depends on the National and local traditions to what extent they are involved in preparation of these reports; the usual approach is that student opinions are summarized and included in the evaluation as concerns the quality of courses or programmes. Representation of students in governing bodies is organized through student self-governments; this is described in the internal regulations of self-governments of students.

Apart from student participation in governing structures, a widespread form is use of student questionnaires. In all countries they are used in connection with self-evaluation done prior to accreditation. In SK there is an elaborate system of questionnaires, including electronic ones, designed by students and regularly used for evaluation of teaching staff and courses; students are participating in design of questionnaires in some (not all) institutions in CZ, LV. Students’ judgments on the quality of education are a legal requirement in NL. A regular feedback from students in all study programmes is a formal requirement in the institutions in UK, and also there are formal requirements to staff to provide feedback and organize corrective actions.

Real influence of students on development or revision of study programmes has not been the subject of research at this stage and will be considered specifically in subsequent work packages.

5. How does the policy involve specification of the relationship between teaching and research?

In this respect we can find wide variations across countries and institutions. In nearly all cases one can find reference to research, but with rather different implications. Firstly it depends on the National tradition. Thus, in UK the management of research units is rather separate from academic and defined in a separate set of documents, even in institutions with a significant share of research activities. In NL, similarly, research is legally a major task in universities (applied research in Universities of Applied Science); however, it is not considered a criterion in the quality of the academic work, except that it has to be part of the contents of student course work, especially in the 2nd and 3rd cycle. Applied research is indicated in polytechnics in PT. In LV, although the funding of research from the state budget has been permanently decreasing, the scientific papers of lecturers are considered as one of the main quality criteria for recruitment of staff in universities, and bachelor and master thesis are necessarily based on research in the respective subject area. In pedagogical institutions, and also in universities involved in teacher training, the research is oriented to educational science and didactics. In some newly established vocationally oriented institutions (e.g. some institutions in LV), there is no particular emphasis
on research but rather on practical work – both when considering the qualification of staff and in the contents of studies. Linkage between research and studies is formally declared in all institutions in CZ, but question remains concerning the practical implications of this linkage.

One cannot find much in terms of specific incentives to promote research as an integral part of teaching and learning processes. There are attempts to establish certain criteria for promotion of research in HEI in Latvia by modulating the state funding. At present part of the funding from EU structural funds (notably ESF) is used to stimulate participation of lecturers in EU research programmes (such as FP7) or doctoral studies in the fields where it is considered crucial for development of staff. There are incentives at National level in NL to stimulate obtaining master and doctoral degrees by lecturers in vocationally oriented institutions coming from the employers’ organizations. Specific financial incentives for promotion of research are present in some institutions in CZ and SK.

6. What are the ways of policy implementation, monitoring and revision?

The implementation of quality policies in most institutions under the review can be defined as top-down measure. Especially it has to be mentioned for smaller institutions with a narrow scope of studies where the central bodies are keeping their finger on all the developments. There are a few cases where part of the responsibility has been moved to lower managerial levels (1 institution in SK, 1 in PT). By way of necessity, the QM or QA is more decentralized in large institutions with large number of study programmes, because only at the programme level all the necessary data can be collected for self-evaluation or for external assessment. However the system as such is organized and maintained by central management units. What can be considered as a real bottom-up approach is preparation and organization of new study programmes, especially in cooperation with partners from other institutions and other countries as that has to involve a quality plan; such examples must be present in all countries; however the methodology of this research does not reveal such cases in this stage, in which the focus is on policy documentation; one has to pay attention to this question in later stages when we shall be doing interviews at faculty and departmental level.

7. How does the policy involve the statement regarding the collaboration with the secondary education sector?

Collaboration with the secondary education is not part of the ESG, and it is not part of the National legislative documents on HE; it seems to be a common tradition in all the participating countries that National legislation for these sectors is separate and administration of schools at National level is done by different ministerial departments (and not long ago in some countries by different ministries). So although it is clear that secondary education is dependent on new ideas for contents and methods of teaching coming from universities and HEIs are dependent on secondary education for getting quality applicants, there is not much one can find in institutional policies concerning collaboration with schools in general strategy documents or short
descriptions on institutional policy. However, collaboration with schools in some form is present at least in part of institutions in all the surveyed countries. Where teacher training is one of the main tasks of the institution, collaboration with the secondary education sector is noticeable in the contents of research activities, involving also students at bachelor and master level aiming at different aspects of contents of the secondary education and on methods and aids in teaching specific topics or subjects. These activities are funded and their quality is monitored among other academic and research activities. Secondly, there is a national policy and institutional policies on recruitment of students; this is described in the internal normative documents on admission and admission bodies. Thirdly, there are specific initiatives at discipline level, such as national competitions (in general subjects such as mathematics, languages, chemistry, physics or concerning certain professions such as business management, tourism, maritime affairs), project weeks, open door events, visits to schools to raise interest for studies. As the teacher training seems to be one of less represented fields in the sample surveyed, we do not find much information on the 1st mentioned direction in the National studies (University of Latvia in LV can be mentioned as one of typical examples for this direction). The second direction is one of the subjects of study for the next work package, and it needs to be included in all the institutions; there are certain reflections on this issue concerning the quality of studies (UK). Information on the third one can be found in plans and activity reports of faculties and specific departments, (e.g. in some institutions surveyed in LV, CZ, SK, PT), although it is not considered an integral part of the institutional policy on quality assurance but rather as one of the activities in structural units responsible; its main purpose is to increase the interest of would be students to specific institutions or specific fields of studies thus getting a better quality of ‘raw material’, which is one of the preconditions for good quality of the ‘product’ of HE.

CONCLUSIONS

So far in most countries there is no specific policy for implementing the ESG for internal quality assurance in HEI, except for recommendations to accreditation bodies and to external experts. The exception is NL where the National policy clearly orients the HEI towards adoption of the principles of the ESG. Nevertheless, most of the contents of ESG is implicitly present in the institutional policies; some institutions have started work on inscribing ESG as such into their quality management or quality assurance systems. So far most institutions in all participating countries have developed QMS, and they include processes and procedures that are not inconsistent with ESG. Some institutions that do not have a complete and concise QMS, have nevertheless a computerized system to maintain the development and monitoring of study programmes and study courses, and the normative documents concerning main processes, structural units and governance are very closely related to quality issues and definitions as they are used in ESG.
Facilitating and hindering factors at country level

As far as the National policy is concerned it is difficult to speak of barriers in full sense of the word because ESG does not contain anything that would contradict good practice and anybody could freely exploit them independent on whether they have been mentioned in National policies or National legislation on Higher Education. In practice, though, absence of legal levers and incentives at National level is definitely one of the factors that is slowing down implementation of ESG in the HEIs. This is characteristic not only for ESG but many other recommendations elaborated in European or global context. Inclusion of ESG into legislative acts would become one of the facilitating factors at National level. Some of the elements pertaining to ESG are regulated at National level, and for that reason they are necessarily at some degree compulsory to HEIs and implemented there. This concerns involvement of students in decision making bodies in HEIs, recruitment of staff, access of students to study cycles, system of marks and awards. In most countries under survey the National Qualification frameworks have been adopted at governmental level, and they are being included in the institutional policies so that one can expect focusing of quality issues towards learning outcomes. In all participating countries there is an unambiguous requirement to ensure quality of studies as a prerequisite to accreditation of study programmes and institutions, although there is a wide margin for the ways and means to achieve that.

On the other hand, lack of clear and consistent National policies can shift the focus of the quality policy away from ESG. One of the contradictory issues in this respect is the attitude to university rankings. Introduction of ESG as any systematic improvement takes some effort, and it is very tempting instead to just take some simple indicators used in the ranking systems and indiscriminately apply them as a measurement of quality, e.g. citation indexes of lecturers as a measurement of quality of study programmes or quality of research or of linkage between research and studies; or take the place of the university in a world ranking system as the measurement of quality of all studies in that institution. To benefit from results of ranking, it is important to “find out what is actually being measured and compare it with what is said in the descriptions of indicators or groups thereof”.

Barriers to implementation of ESG at institutional level

The central administrative bodies of institutions under survey do not consider implementation of ESG an obligation and are reluctant to invest extra effort to perhaps create additional bureaucracy and extra work. That does not mean resistance to quality assurance as an issue altogether, because in most cases the quality matters are dealt with in a regular way, only according to the understanding and the liking of authorities of each institution.

There is a shortage or lack of communication between different involved actors concerning ESG. There is not enough practical advice on how to develop a proper quality culture and more often than not it is replaced by introduction of more top-down control and more bottom-up paper reports.
As the barriers are mostly depending on the attitudes of staff involved, the solution, perhaps, has to be mainly sought in advising and encouragement of movement in the right direction. However, these are only tentative conclusions based on study of documentation and occasional discussion with the top management of the selected institutions. They have to be verified during the next stages through the interviews at other levels.

**Examples of good practice**

It is questionable if we should speak of good practice at this stage. Certainly, creation of QAS or QMS in institutions is showing that quality issues are being taken seriously, and there is a good ground for optimism. Some countries have managed to support the development of internal quality assurance systems from European structural funds (CZ, SK). If one seeks for explicit reference to ESG in the quality policy, NL as a country can serve as an example of good practice. There are some examples of financial incentives to introduction of ESG (SK). There are a number of good examples mentioned in each of the 7 chapters of this work package in the National studies. However, we would prefer to wait until some field work done to see how the policy is understood and carried out in the structural units and in the classes.

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