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Cultures of Quality: An International Perspective

Final Report of Phase 2

Australia Brazil India
Mexico Portugal

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An International Perspective

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Executive summary

The report examines the cultures of quality assurance within higher education systems and institutions and considers the factors that shape them and the effects that they have upon educational processes and outcomes. In particular, it examines the appropriateness of risk-based systems of quality assurance in different national and institutional contexts and considers the potential application of embedded quality assurance cultures in meeting effectively the needs of increasingly diverse and mixed economies of higher education. The report draws on the relevant research literature and considers, in particular, developments within the five contrasting national contexts of Australia, Brazil, India, Mexico and Portugal. Some implications are also drawn for the changes currently being implemented in UK higher education.

Quality assurance has diverse purposes which are emphasised at different times in different contexts by different stakeholders, and which reflect a range of dimensions from management and control to change and improvement. Some quality assurance processes focus directly on educational provision and its effects upon students and society, while others focus more on the organisational and managerial procedures that are in place to ensure quality and standards. There are both internal institutional and external regulatory and cultural aspects to these processes.

Risk-based quality assurance in higher education

Risk-based quality assurance requires a prioritisation of focus and resources of quality assurance processes to be governed by understandings of where risk lies: to institutions, regulators, tax payers, the higher education sector and its relationship to society. Risk-based approaches may be formalised or relatively informal and negotiable, depending on contexts and relationships. Australia and the UK are cited as among the more formalised risk-based systems of higher education quality assurance.

The research reviewed in this report suggests that risk-based regulation needs to be applied in a reflective and nuanced manner and not as a mechanical/quantitative process. It needs to be responsive to the regulated institution's behaviour, attitude and culture, to institutional environments, to interactions of controls, and to regulatory performance.

Three key messages from the research literature on risk-based quality assurance are that

- a lighter touch is a more effective touch
- collaboration brings commitment
- diversity and change must be recognised.

Quality cultures in higher education

Cultures have content and memberships and these differ across contexts. Within higher education, they can be defined at national system, institutional and disciplinary levels, though increasingly there is movement across organisational boundaries. This can involve sharing and changing behaviours within higher education, although local cultures can also serve to block the implementation of externally imposed changes. The concept of 'quality culture' in higher education has been used recently in international programmes to help to develop effective quality management and development.

An important feature of the concept of quality culture in higher education institutions is that it belongs to people and not organisations. It derives from the values and attitudes of people rather than from institutional mission statements and strategy documents, although the latter can affect the former. And history is important. Cultures don't change easily. Additionally, there is a question of whether risk-based quality assurance systems encourage cultural conformity and compliance or can support change and innovation.

Three key messages from the research literature on quality cultures are that:

- cultures are possessed by people in places and can be both drivers and obstacles to change
- quality cultures may 'require' or 'replace' quality learning
- cultural changes may be organisationally 'top-down' or 'bottom-up'.

Risk-based quality assurance and quality cultures in different national higher education systems

The above concepts are applied in order to examine developments in five national higher education systems: Australia, Brazil, India, Mexico and Portugal. The national cases point to a number of key themes relating to quality cultures and the development of risk-based quality assurance.

i The balance between 'soft' and 'hard' elements and how this translates in different ideal types of quality culture.

'Hard' elements tend to emphasise rule-following and accountability and 'soft' elements emphasise a sense of belonging and group thinking. While there are national system differences, the trend appears to be towards more 'hard' elements with consequent shifts in quality cultures towards compliance and control.

ii A shared understanding of 'quality culture' between actors in the system can have its effects on risk-based quality assurance.

The extent and content of a shared understanding of quality culture across a national system can affect the degree of risk that regulators are willing to take in the design and implementation of quality assurance systems. Where such an understanding is lacking, regulators may be less willing to take risks.

iii The top-down vs bottom-up question in developing quality cultures.

In general, emerging economies with large and diverse higher education systems, and often with a mixture of regulation and risk-avoidance, tend to adopt top-down approaches to developing quality cultures.

iv The locus of authority.

The location and autonomy of the validation body in the higher education system can affect both the quality culture within the system and the level of risk-based quality assurance.

Conclusions: risk-based quality assurance and quality cultures in a changing UK higher education scene

The final section of the report considers three key messages from the project for the higher education system in the UK and for some of the considerable changes that are planned for it.

i Differentiation ***and diversity***. Expanding mass systems of higher education tend to be increasingly differentiated systems. This concerns not just new institutional providers but the needs of all institutions to change and develop to meet changing societal demands and needs. Depending on how they are implemented, quality assurance processes can either support and enhance change and innovation in higher education or they can block it. In practice, they need to be able to do both, depending on contexts, and thus need both the 'hard' and the 'soft' elements of risk-based approaches. The message from this is that quality assurance needs to do different things at different times and in different places. Another form of risk is to apply the wrong conception of quality assurance to the particular circumstances of time and place.

ii ***Peer review and quality cultures***. While expanded mass systems of higher education tend to possess more formalised regulatory procedures than small elite systems, quality assurance also needs to develop cultures that emphasise sharing of experiences and the lessons from them, and the shaping of values and attitudes that emphasise the quality dimensions of the higher education experience. Peer review processes provide learning experiences for all participants, from which improvements and innovations can occur. Excessive use of metrics may produce a formalised picture of quality, which challenges the more informal quality cultures existing within institutions and which can generate responses of compliance and conformity.

iii ***External and internal processes of quality assurance***. Depending on their features, external processes can either support or undermine internal quality assurance within institutions. And, according to a new UNESCO report, it is the latter which have the biggest effect on quality. Therefore, if the new arrangements for higher education quality assurance in the UK are going to impact positively on the quality of the student experience, they will need to take account of the important role played by internal institutional quality assurance processes.

1 Introduction

The project on which this report is based was an attempt to examine the cultures of quality assurance that exist within higher education systems and institutions, to consider the factors that shape them and the effects that they have upon educational processes and outcomes. The project took a comparative approach to examining how quality is achieved and assured in expanded and differentiated higher education systems of the 21st century, systems which, however, have different historical roots as well as different contemporary social and economic contexts.

The concept of quality culture is examined in detail in later sections of the report. Here, we will note just that culture in this context contains a mix of the values held by groups and individuals which, together with organisational structures and processes, shape behaviours and their outcomes. However, the content of the quality culture may differ in different places, as will the importance assigned to it.

Phase 1 of the project[1] produced profiles of higher education and its quality assurance arrangements in nine countries (UK, USA, Australia, India, China, Brazil, Mexico, Chile and Columbia), identifying the expansions which had occurred over the last 20 years, the evolving balance between public and private provision, and the different approaches to regulation and quality assurance in the different systems. Important contextual factors identified in Phase 1 included (i) the changing role of nation states from 'provider of services' to 'facilitator of provision', (ii) changing governance arrangements posing new questions at different levels across higher education systems, (iii) the massification and differentiation of higher education systems, (iv) a greater transparency, bringing greater reputational and other risks (and opportunities) to institutions, (v) a movement from national to transnational systems.

The Phase 1 project raised definitional questions about higher education, questions about the location of authority and decision-making, about the relationships between policies and practices in institutions of higher education, and about the extent and nature of the diversity of institutional provision within the expanded systems and the societal and economic needs that were being served by it.

Drawing on much of the classic research literature on higher education, traditions of academic freedom and institutional autonomy were identified but there was also strong evidence that these were being increasingly challenged by more 'managerial' and 'neo-liberal' developments. The tensions between the two raised questions about the relationships between the formal and the informal worlds of higher education, and between policy and practice in the operation of higher education systems and institutions. Related questions concerned the extent and the nature of external controls over higher education and the ways in which high quality provision could be achieved within different contexts, both organisational and social. The comparative approach to attempting to answer these questions reflected a goal of identifying and sharing good practices across national and institutional boundaries, a goal which itself is often regarded as central to an effective quality assurance system.

[1] *Encouraging cultures of quality: an international project.* 2015, Quality Assurance Agency for Higher Education.

Phase 2 of the project has sought to answer two central research questions:

- Is a risk-based system of quality assurance the most appropriate for rapidly developing nations, with high levels of private provision in higher education?
- What examples of embedded quality assurance cultures exist that might be applied effectively and quickly to mixed economies of higher education?

The two questions will be addressed through examination of relevant research and policy literatures and also through consideration of developments in five national contexts: Australia, Brazil, India, Mexico and Portugal.

Before examining the central concepts of 'risk-based quality assurance' and 'quality cultures', some initial consideration needs to be given to the concept of quality assurance itself. Harvey (2008 and 2016) has identified four basic roles or purposes of quality assurance: accountability, control, compliance, and improvement. He defines *accountability* as 'institutions taking responsibility for the service they provide (that an appropriate educational experience is both promised and delivered) and the public money they spend'. *Control* is about 'ensuring the integrity of the higher education sector, in particular making it difficult for poor or rogue providers to continue operating and making access to the sector dependent on the fulfilment of criteria of adequacy'. *Compliance* is 'ensuring that institutions adopt procedures, practices and policies that are considered by funders, governments and professional bodies to be desirable for the proper conduct of the sector and to ensure its quality'. And *improvement* is 'less about constraint and more about the encouragement of adjustment and change'.

While quality assurance systems and practices might combine several or even all four of these dimensions, the different dimensions tend to be emphasised at different times in different contexts by different stakeholders. There is also a major difference between quality assurance processes that attempt to focus directly on academic quality and standards and processes that focus more on the organisational and managerial procedures that are in place to ensure quality and standards. Quality assurance also generally has both internal and external dimensions for institutions, with different relationships between the two found in different places at different times.

Quality itself has different dimensions, including the appropriateness of goals (or 'fitness of purpose'), the features of the educational provision provided (curriculum, teaching methods, support services), the effects of the provision upon students (learning outcomes), and the extent of students' satisfaction with the experiences and outcomes (the 'consumer' emphasis).[2]

These definitional variations will need to be borne in mind as we move on to consider questions of 'risk-based quality assurance', as they pose questions concerning 'who' or 'what' is at risk as well as the extent and nature of the risk.

[2] The UK Government's Teaching Excellence Framework utilises three aspects of quality in the measures used: Teaching Quality; Learning Environment; Student Outcomes and Learning Gain.

2 Risk-based quality assurance in higher education: an overview

Risk-based regulation is new to higher education, at least as practised formally by external quality assurance agencies. Only Australia and the UK formally adopt such an approach, and each is distinctive. Nonetheless, external quality assurance agencies, like most regulators, generally find that they have more work and issues to deal with than time and resources allow. Hence, in practice, we find that informal risk-based quality assurance may be a more common feature of higher education regimes than appears on the surface. That is, prioritisation of focus and resources is governed by understandings of where most risk to institutions, the regulator, the taxpayer, and the sector overall, lies. It involves evaluations of the risks of non-compliance and calculations regarding the impact of such non-compliance on regulatory objectives.

An important issue is to consider whether a formalised, or formally declared, risk-based quality assurance methodology has advantages over more informal risk-based approaches. For example, transparency, accountability, and clarity of approach may be best served by a fully codified and explicit embrace of the risk-based methodology. In its idealised form, risk-based regulation offers an evidence-based means of targeting resources and attention in accordance with a systematic and defensible framework.

Nonetheless, there are model risks associated with such formality (can all risk be fully scoped and categorised?), and include potential data-driven demand overload of those being regulated. More informal approaches may generate nuanced methodologies involving judgement and flexibility of approach as dictated by circumstances. However, transparency and consistency of risk approach may be compromised.

While risk-based regulation may be relatively new and rather limited in higher education sectors, it is quite prevalent in other sectors and across many countries, including the environment, financial services, food standards, occupational health and safety, and pensions. In the UK there is a statutory obligation on regulators to pursue a risk-based framework for organising all aspects of their regulatory activities, including data collection, inspection, advice and support programmes, and enforcement and sanctions.[3]

Some analysts argue that risk-based regulation works best when it is 'really responsive' regulation. By 'really responsive' regulation is meant

> 'a strategy of applying a variety of regulatory instruments in a manner that is flexible and sensitive to a series of key factors. These include not only the behaviour, attitude and culture of the regulated firm or individual, but also the institutional environments in which regulation takes place, the ways in which different control instruments interact, the performance of the control regime itself, and the changes that occur in regulatory priorities, challenges and objectives' (Baldwin and Black 2010, p. 182).

That is, risk-based regulation needs to be applied in a reflective and nuanced manner. Such a framework forces a move away from a rather simplistic view of risk-based regulation as a mechanical/quantitative means for solving regulatory problems. Risk-based regulation,

[3] The *Regulators' Code* (legislated in 2007 and updated in 2014) is not mandatory for every regulator but, effectively, the UK Government has acted as though it should be, including for HEFCE, QAA and the new OfS.

rather, is conceived in a more complex way - as a means for beginning to construct and address a number of key regulatory issues and tasks. Five such fundamental tasks may be identified: i) detecting undesirable and noncompliant behaviour, (ii) responding to that behaviour by developing tools and strategies, (iii) enforcing those tools and strategies on the ground, (iv) assessing their success or failure, and (v) modifying approaches accordingly.

The best way to apply a risk-based approach is in a 'responsive' way: to the regulated institution's behaviour, attitude and culture; institutional environments; interactions of controls; regulatory performance; and change. Additionally, it is important to recognise that risk-based regulatory challenges are likely to vary across different regulatory tasks and will need modulating.

In terms of Harvey's four conceptions of quality assurance, risk-based approaches seem to be based mainly on the concepts of control and compliance, the need to ensure that basic quality and standards are being achieved or, in the words of Baldwin and Black above, to detect and remove the 'undesirable' and 'non-compliant'. Thus, there is likely to be an emphasis upon 'new' providers of higher education where there is a risk that existing quality and standards may not be being achieved. Institutions that have substantial and successful experience of providing acceptable levels of quality pose a lesser risk and therefore may require less scrutiny from external quality bodies. However, as we shall see later, past successes are not necessarily guarantors of future successes. Conformity and stagnation can be a different kind of risk and one that is certainly not limited to new providers. There is a risk that external quality assurance procedures will encourage conformity and compliance at the expense of needed change and innovation. Tensions of this kind will be considered further in the section on quality cultures.

Turning to some of the national examples described later in this report, we can note the risks perceived to arise from expansion and differentiation of higher education systems. The Portuguese case describes the diminishing public trust in a large and expanded higher education system and the move from a relatively 'soft' to a more 'hard' accreditation system to provide greater accountability to wider publics. However, the Portuguese case is also interesting because the accreditation system is organised in two phases, with the preliminary accreditation phase, based on some key indicators, being used to eliminate the most obvious 'cases of failure'. As noted in the case study, the preliminary accreditation of existing programmes adopted a softer approach than the preliminary accreditation of new study programmes, especially in new institutions.

In contrast, in the large Indian higher education system, with 30,000 college providers, most of which receive their accreditation from established state universities, there is a reputational risk to the universities from the delegation of trust and responsibility to them for the quality and standards in the colleges. Whereas the situation described for Mexico is of accreditation focused on the more prestigious public sector universities, with only limited regulation of new private providers. On the face of it, this suggests a quality assurance system focused on 'identifying the best' and rather 'ignoring the rest'. In Brazil, however, there is strong regulatory control exercised across the whole system, involving measures of student performance as well as programme and institutional evaluations. However, the Brazilian example appears not only to be about assuring necessary control and compliance but also in generating rankings and potential reputational gain and loss, and hence risk.

Further details of the different national cases are provided in section 4 and in the annex to this report. Below are some tentative conclusions about risk-based quality assurance.

Risk-based quality assurance: three key messages

(a) A lighter touch is a more effective touch

Risk-based forms of regulation, including of new, often private, newcomers to a sector, often assume that well-established organisations should be subject to 'light touch' approaches while coming down much harder on newcomers without such a track record, not least to ensure deterrence and accountability. However, there is evidence that a 'soft' approach might be needed for incomers as well, including those that are for-profit private providers. Broad regulatory evidence suggests that even new organisations perform best when they receive a softer oversight of their activities. In the UK, the use of advice and persuasion, as the first step for regulatory officers, was set out in the Hampton Report of 2005, and subsequently incorporated in the Government's statutory code of practice for regulators, the *Regulator's Code* of 2006 (BIS).

(b) Collaboration brings commitment

Human behaviour is strongly responsive to social influences: people want to conform to the perceived behaviour of other people, including that which is highlighted by the regulator. Notions drawn from behavioural psychology, ideas of shared ethical values, and an emphasis on economic and cultural incentives, indicate that a collaborative approach between institutions and quality agencies may work best in securing the committed compliance of institutional newcomers to a sector. In this way, a starkly contrasted risk-based methodology may not work that well.

(c) Recognising diversity and change

The multiple functions of quality assurance in expanded and differentiated higher education systems need to be taken into account. Quality assurance is not only about ensuring control and compliance to existing standards, it is also about supporting change and innovation across higher education in order to meet changing societal needs and contexts. Institutional and social contexts need to be taken into account, again requiring a collaborative approach between institutions and quality agencies.

3 Quality cultures in higher education: an overview

Culture can both facilitate and limit change within an organisation. In his classic work on higher education systems, Burton Clark wrote that

> 'All major social entities have a symbolic side, a culture as well as a social structure, some shared accounts and common beliefs that help define for participants who they are, what they are doing, why they are doing it, and whether they are blessed or cursed.' (Clark, 1983, p72)

At the time that Clark was writing, and for some time after that, cultures within higher education seemed to be mainly the possession of either students (e.g. Becker, 1967, Pascarella and Terenzini, 2006) or of academic disciplines (e.g. Biglan, 1973, Becher, 1989), the latter reflecting the dominance of disciplinary 'basic units' within higher education organisational structures.

Culture has a content and a membership. The anthropologist Mary Douglas referred to the two dimensions of 'group' and 'grid' in analysing cultures (Douglas, 1982). Group referred to the strength of group boundaries and grid referred to the intensity of the external rules and regulations imposed on the individual. Douglas used these dimensions to develop a typology of social cultures: as hierarchy, fatalism, egalitarianism and individualism. Insofar as changes to higher education in recent decades have tended to entail a weakening of boundaries between basic disciplinary units through a growth in multidisciplinarity and a growing centralisation of decision making, Maassen has argued that a greater fatalism or individualism can be found within higher education cultures: fatalism where the external rules and regulations are strong and individualism where rules and regulations are weak. Maassen concludes that these changes have resulted in distinctive cultural changes within higher education, reflecting greater competitiveness and greater intensity of evaluation as well as changing balances in the degree of centralisation, of both higher education systems and institutions.

Harvey and Stensaker (2008) have adapted Douglas's concepts to suggest four 'ideal types' of quality cultures based on (i) the strength of group control and (ii) the intensity of external rules. The four types - responsive, reactive, regenerative and reproductive - are summarised in the table below.

Table 1. Ideal types of quality cultures

		Degree of group control	
		Strong	**Weak**
Intensity of external rules	**Strong**	*Responsive quality culture* Led by external demands, opportunistic, combining accountability & improvement, but perhaps also sometimes a lack of ownership & control	*Reactive quality culture* Reward or sanction led, task oriented, doubts about the potential for improvement, compliance ('beast to be fed')
	Weak	*Regenerative quality culture* Internally oriented with strong belief in staff and existing procedures, widespread, experimental, although not always adaptive to external demands and developments	*Reproductive quality culture* Wanting to maximise the impact of external factors, focusing on sub-units, lack of transparency throughout the institution, emphasise the expertise of the individual

Source: Harvey, 2016, adapted from Harvey and Stensaker, 2008

In considering the effects of quality assurance systems and processes on higher education cultures, an important distinction concerns the unit of analysis for evaluation. External evaluations at the subject level generally embrace and can strengthen disciplinary cultures, as was the case for many continental European higher education quality systems. However, external evaluation can also strengthen authority at the institutional level by placing the exercise of responsibility at that level, by scrutinising internal mechanisms of accountability, and by requiring institution-wide policies and effective strategies for their implementation (Brennan and Shah, 2000). The latter is generally regarded as representing the Anglo-Saxon approach.

An Organisation for Economic Co-operation and Development (OECD) project at the end of the 1990s summarised the following as some of the major cultural changes occurring within higher education systems and institutions as a result of the growth and development of external quality assurance systems:

> '…increased productivity, greater emphasis on teaching, new definitions of and a more collective approach to teaching, and a more rational and evidence-based approach to decision-making...' (Brennan and Shah, 2000, p121)

However, the OECD report notes that cultural changes had tended to be more visible at central and institutional levels, where external requirements and pressures tended to be

most felt, and less so at faculty and departmental levels, where traditional loyalties and values were a source of resistance to externally imposed changes.

More recently, a concept of 'quality culture' has been used explicitly by the European Universities Association (EUA) as a central feature within its development programme for quality management and development. The EUA defines quality culture as follows:

> 'Quality Culture refers to an organisational culture that intends to enhance quality permanently and is characterised by two distinct elements: on the one hand, a cultural/psychological element of shared values, beliefs, expectations and commitments towards quality and, on the other hand, a structures/managerial element with defined processes that enhance quality and aim at co-ordinating individual efforts.' (EUA, 2006)

The two elements fit only roughly into Douglas's group/grid distinction, with the structures/managerial element approximating the grid element and the cultural/psychological element based on, but going beyond, the group element to specify the cultural elements that the 'group' should possess. Although not explicitly stated in the above quotation, the EUA approach appears to perceive the 'institution' as representing the group dimension, raising the important question of whether group members also perceive this and where they sit within the Douglas options of hierarchy, fatalism, egalitarianism and individualism.
The answers will clearly differ between institutional and system contexts but they will also be important determining factors of the impact that quality culture has upon the higher education experience in different places.

An important feature of the concept of institutional culture is that it belongs to people and not organisations. Institutions may possess mission statements and strategies, but the habits and attitudes of people - staff and students in the case of higher education - can subvert these institutional features, hence the importance of the cultural/psychological part of the EUA definition.

Dill has recently employed the 'commons' model developed by Ostrom[4] for addressing issues of collective action in self-governing communities in order to develop strategies for improving quality assurance processes in higher education. From this model, the 'commons members' of universities (i.e. the academic staff) develop the ability to improve their professional activities by learning from each other in a collegial manner. The activities involve

> 'building shared identities, developing valuable common knowledge in research among academic staff members, as well as generating and communicating communal norms and values through socialisation and internal regulation.' (Dill, 2016)

More specifically, within quality assurance processes, 'commons' activities include peer review and course teamwork. In addition, Dill draws on research by Paradeise and Thoenig (2013) to suggest that

> 'the evaluations and influence of respected faculty peers is a much more powerful incentive for real academic change than administrative policies, government edicts, or market forces'. (Dill, 2016)

[4] Elinor Ostrom is a Nobel laureate in Economics.

Reflecting academic norms and priorities, Dill goes on to argue that effective approaches to quality assurance require a 'culture of evidence' for assuring and improving quality and standards and that this requires an appropriate balance between 'strong administrative academic leadership' and 'effective collective faculty responsibility and engagement', in other words an effective combining of both 'vertical' and 'horizontal' lines of authority.

A recent report by the Council for Higher Education Accreditation (CHEA) listed the principles that contribute to a (institutional) culture of quality, whose key aim is defined as continuous enhancement of quality. The report indicates that a culture of quality means focusing on notions of continuous and self-improvement, institutional management, teaching practices, and internationalisation (CHEA, 2016, p13).

In considering the different conceptions of quality cultures, a number of questions arise:

i 'Values, beliefs, expectations and commitments towards quality' may well be shared, but who by? And might the content of these values, beliefs, expectations and commitments differ among different groups, e.g. disciplinary differences and role (manager, teacher, student) differences? That is, there may be considerable diversity in the content of quality cultures.

ii External QA processes may generate cultures of 'quality improvement' or cultures that confirm existing practices. They may generate greater collaboration or greater competitiveness between academic and institutional cultures.

iii There may be a tension between 'top-down' policy-led cultures vs 'bottom-up' practitioner-led cultures (both of which may be mediated by consumerist cultures - students, employers etc.). Where is power located?

iv History is important. Cultures don't change easily (compared with structures and processes)

v Do risk-based QA systems encourage cultural conformity and conservatism and the creation of 'compliance cultures'? Or can they support the opposite, i.e. change and greater diversity? Under what conditions can quality cultures that support development and innovation be created?

Quality cultures: three key messages

(a) People and places

Culture can be defined as having a content and a membership. It also has a territory. 'This is how things are done around here.' But it also has a timeframe. Things can change. Much of the literature on higher education's structural and cultural characteristics distinguishes three organisational levels: the national system, the institution, and the basic unit of department or faculty. But systems differ in where power lies across these three levels and in the degrees of freedom allowed to participants (staff and students). Changes can occur. They may be intended or unintended. They may be top-down or bottom-up. They may affect cultural membership and/or cultural content. Culture may be the mechanism for policy implementation and change in higher education or the mechanism for resistance to, and subversion of, policy intentions. Cultures reflect history and geography. Their values may persist long after the policies and structures that shaped them have disappeared. Thus, are quality cultures primarily drivers of change or primarily obstacles to change within higher education?

(b) Do quality cultures require or replace quality learning?

Quality assurance processes have both hard and soft elements. The 'hard' include the quality management strategies and processes and the consequences that flow from them. The 'soft' include the values, beliefs and commitments of the 'members' of the cultural groupings, whether defined in terms of their organisational position (academics, administrators or students) or their identity/loyalty in academic terms (chemists, sociologists, accountants etc.). Depending on system and organisational context, the hard or the soft can dominate institutional behaviours. Quality cultures of the hard variety may direct attention towards system and institutional requirements and compliance with the values of those 'with power', whereas quality cultures of the soft variety will reflect the values and commitments of individuals in their everyday professional lives. Thus, is it more important to find ways to improve the student satisfaction score as measured by the NSS or more important to prepare properly for Friday's lecture, read the latest literature on the subject, and make time to be available to talk informally with students? Some actions might achieve both goals. But some might focus attention on one and distract from the other.

(c) Are effective quality cultures predominantly 'top-down' or 'bottom-up'?

The European Universities Association (EUA) has identified three dimensions of effective support for quality cultures: strategies, structures and evaluations (EUA, 2011). Additionally, the EUA has also distinguished three dimensions of rewards and motivations for quality cultures: intrinsic, financial, professional. The intrinsic are likely to lie in the everyday activities and experiences of university life whereas the financial and professional relate more to the rewards and longer-term career trajectories of members of the university. The importance attached to these different dimensions by institutions and individuals will affect both the content and the power of the local quality culture. 'Top-down' cultural change may require structural and organisational changes, a 'breaking up' of existing - and often long-held - values and relationships. 'Bottom-up' cultural change may reflect changing motivational factors (and the balance between intrinsic, financial and professional values that underpin them). The 'bottom-up' cultural changes may be subversive or supportive of the strategies and objectives maintained by the 'top-down' changes.

As Harvey has recently reminded us, 'academics are clever people and will circumvent any compliance requirements of which they disapprove' (Harvey, 2016 forthcoming). He goes on to argue that positive engagement by academics is more likely to be achieved when quality assurance is focused on 'creativity, development and improvement'.

4 Risk-based quality assurance and quality cultures in different national higher education systems

So far, the report has highlighted some key messages on both risk-based quality assurance and quality cultures. This section explores how the concepts described thus far apply to concrete national cases. It examines developments in five national higher education systems: Australia, Brazil, India, Mexico and Portugal. More details about each of these national systems and their quality assurance arrangements are provided in an annex to this report.

As mentioned earlier, 'quality cultures' can be drivers of change or obstacles to change because they may reflect resistance to policy intentions. Cultures reflect history and geography. Their values may persist long after the policies and structures that shaped them have disappeared. Cultural change can be 'top-down' or 'bottom-up', and have 'hard' and 'soft' dimensions. An increasing body of literature is concerned with national and institutional policies and instruments to promote 'quality cultures'. For example, national regulations on

external accreditation are, in principle, meant to maintain quality standards and public trust, as well as promote dialogue and exchange between providers. Yet, this bureaucratic (top-down) approach may be seen as problematic (see e.g. Westerheijden, 2013; Brockerhoff *et al*., 2015). Other approaches, e.g. providing 'excellence status' to institutions that have certain excellence characteristics, rather than funding the development of all institutions towards that status, would seem to emphasise existing reputational hierarchies. The latter is the case of a number of Nordic countries (e.g. Finland and Norway). Different cases show all these aspects and it is clear how higher education developments over time have shaped actors' behaviours (e.g. what choices regulators make and how providers react to these choices).

The national cases point to a number of key themes relating to quality cultures and the development of risk-based quality assurance. Two caveats are necessary. First, not all cases are representative of all issues, yet all must deal with them to a greater or lesser extent; second, the themes are not discrete but overlap to some degree because each effectively influences the others (for example, the pre-eminence of hard vs soft elements relates to the question of how top-down or bottom-up the organisation of the QA system is).

(a) The balance between 'soft' and 'hard' elements and how this translates in ideal types of quality culture

As indicated earlier, hard elements emphasise (*inter alia*) rule-following and accountability while soft elements emphasise (*inter alia*) a sense of belonging and group thinking. From this perspective, the balance between these elements can encourage different ideal types of quality cultures in the system, as identified by Harvey and Stensaker (2008) and presented in the table above. The case of Portugal suggests that a shift from a 'soft' to a 'hard' approach may take place as a system expands and diversifies. This may also indicate a shift from a more 'regenerative' quality culture towards a more 'responsive' one.

In India, too, hard elements in the overall quality culture are promoted although this seems more extreme and founded on a top-down tradition. Here, organisations are likely to adopt more responsive or reactive models of quality culture. Brazil is an example of a strong regulatory control exercised across the whole system, using standardised measures. On the other hand, Mexico appears to promote a balance between these extremes, as regulatory requirements such as accreditation are intended to give more prestige to the public sector rather than to control 'degree mills' or the private providers. Australia's risk-based approach appears to seek a balance between the different ideal types as it incentivises cooperation within the system but also provides strong regulation based on 'acceptable risk'.

(b) Sharing the understanding of 'quality culture' between actors in the system can have its effect on risk-based QA

Another important theme which the cases make clear is that the understanding of 'quality cultures' may or may not be shared between actors at different levels in the system (e.g. regulators vs regulated). This problem is, in effect, the operationalisation of the points presented earlier in this report: culture has a content, a membership, a territory and a timeframe. The question is, how much of this is shared and does the national context play a role? Moreover, not only does the extent to which a shared understanding of quality cultures exists within a system shape the type of institutional reaction to it but, importantly, it can affect the degree of risk that regulators are willing to take (i.e. it can shape a risk-based approach to quality assurance). The establishment of Portugal's National Higher Education Evaluation Council (*Conselho Nacional de Avaliação do Ensino Superior* [CNAVES]) was founded on strong cooperation with the Rectors' conference. This meant initiating a robust culture of self-evaluation based on a shared understanding of quality between regulators and regulated (although it also raised questions about the agency's independence).

At the same time, Portugal is a good example of a risk-based approach to quality assurance where institutional self-reporting and objective indicators (as opposed to 'earned trust' alone) are key. In contrast, Brazil's use of a homogeneous scoring methodology across the system, which is also used to generate rankings, suggests the absence of a shared system-level understanding of quality culture as a multi-dimensional concept (i.e. one that takes into account the diversity of institutional missions, provision modalities, student base etc.). Moreover, this approach also seems to imply that the regulator is intent on 'treating everyone the same' rather than looking where more risks to regulatory objectives might be found (see also Black, 2010; and Hutter, 2005). Mexico appears to be somewhere midway, with a strong use of quantitative measures for assessment but not universally homogenous across the system. India's universe of colleges is for the most part reliant on the status of the universities under which they fall, and the system includes a complex wealth of different validation agencies. In this case the regulator trusts the universities to be the monitors of quality of the colleges.

(c) The top-down vs bottom-up question

The report describes how cultural change can be top-down or bottom-up. It is the relationship between the two that shapes the national level. In broad terms, top-down change involves organisational reforms while bottom-up is more concerned with motivational factors (see above). The cases show how, generally, emerging economies with large and diverse systems, where regulation and risk-avoidance prevail, also adopt a stronger top-down approach (e.g. Brazil and India).

(d) The locus of authority: the place and autonomy of the validation body in the system can affect both the quality culture within the system and the level of risk-based QA

An important element in promoting quality in the system, and which affects cultures of quality and levels of risk-taking, is where the validation agency is positioned and its level of autonomy. As mentioned above, in Portugal, CNAVES was criticised for its lack of autonomy because of its limited independence from institutions (a new agency was established in 2007). India's National Assessment and Accreditation Council (NAAC) is also said to lack autonomy because of its strong reliance on the University Grants Commission (UGC), which is the country's prime regulatory *and* funding body for higher education. The latter is, for example, in stark contrast with Australia's Tertiary Education Quality and Standards Agency (TEQSA). Mexico's several private accrediting agencies must be authorised to operate by the Council for the Accreditation of Higher Education (*Consejo para la Acreditación de la Educación Superior* [COPAES]),[5] established by government in 2000.

[5] www.copaes.org

5 Conclusions: risk-based quality assurance and quality cultures in a changing UK higher education scene

While the original focus of the project was to examine the roles played by risk-based quality assurance and quality cultures within higher education systems in developing economies, the relevance to developments in UK higher education (and systems in other developed nations) became clear as the project progressed. Therefore, this final section of the report considers the messages arising from the project for the higher education system in the UK and for some of the considerable changes which are planned for it.

Two initial caveats need to be mentioned. The first is that the boundaries between different national higher education systems become increasingly blurred with the growing international mobility of both students and staff as well as the increasing use of modern communication systems. National higher education systems, which are themselves increasingly differentiated, may become more so as they become more open to the traditions and experiences of other systems. But there may also be drivers of convergence arising from the increasing cross-border mobility.

A second caveat relates to the capacity of cultures to defy, or at least moderate, the effects of changing policies, whether national or institutional. This refers us back to the tensions between 'top-down' and 'bottom-up' pressures for change referred to earlier in the report. In the context of risk-based regulatory policies, the force of institutional and academic cultures might suggest a greater potential effectiveness of 'soft' approaches to risk-based quality assurance and is a reminder of the balance and tensions between the formal and the informal in driving change and decision making. Risk-based regulation needs to avoid a mechanistic, entirely data driven approach and should involve forms of regular 'soft intelligence' gathering.

Differentiation and diversity

We have referred to the growing differentiation and diversity of expanding higher education systems several times in this report. This is also the case within the UK with the arrival of large numbers of new providers of higher education. Some of these are attempting to do 'new things' and some are attempting to do more traditional things, though sometimes in new ways or for new audiences. But either way, differentiation and diversity raise questions for quality assurance and, in particular, for how we assess 'risk'. Referring back to Harvey's four conceptions of quality assurance, we might assume that 'control' and 'compliance' will limit, if not completely block, change and innovation. Yet a control element is inevitably going to be a strong element in quality assurance directed at new providers, because 'risks' are higher.

This perhaps points again to the desirability of the 'soft' approaches to the implementation of risk-based approaches to quality assurance, and the need for flexibility and responsiveness from regulatory bodies. The two-stage processes of quality assurance, as practised in countries such as Brazil and India, can sometimes be a way of obtaining the benefits of both 'hard' and 'soft' approaches and avoiding the potential rigidities of the former.

But differentiation and diversity concern not only new providers. Both are features of the existing higher education system and may be increasingly necessary in order to respond to changing societal needs. Depending on how they are implemented, quality assurance processes can either support and enhance change and innovation in higher education or they can block it. Of course, some changes and developments need to be blocked but some need to be supported! Quality assurance needs both its 'soft' and its 'hard' dimensions if it is going to do both.

Differentiation of higher education is not just a matter of institutional differences. Study programmes may be disciplinary or multi-disciplinary, pure or applied, full-time or part-time. Students will have different social and educational backgrounds, be at different life stages, and indeed have different reasons and purposes for studying their courses. There is a danger with some approaches to quality assurance that differences are not recognised, that rules and rankings dominate. Students and the wider public need assurances not just that the education is 'good enough' but that it is the kind of education that they want. The provision of evidence of 'difference' could be an important feature of quality assurance, enabling potential users of higher education to make informed choices.

The message from this would seem to be that quality assurance needs to do different things at different times and in different places. Thus, another form of 'risk' is to apply the wrong conception of quality assurance to the particular circumstances of time and place. Adaptation and flexibility are needed.

The informal and the formal: peer review and quality cultures

There is undoubtedly pressure on expanded mass higher education systems to possess more formalised regulatory procedures than existed in small elite systems. There is more at risk! At the same time, there are dangers that some of the intrinsic strengths of academic cultures may be undermined as a result. The literature on quality cultures is a useful reminder of the benefits that can come from peer review processes, both within and between institutions. They provide learning opportunities for all participants. Experiences can be shared. Knowledge can be transmitted. Learning takes place and improvements can occur.

Changing institutional cultures and management practices may be creating greater competitiveness at the expense of collaboration between staff in higher education. Quality assurance can assist in developing cultures that emphasise sharing and collaboration. Quality cultures are about informal relationships, the sharing of experiences and the lessons from them, and the shaping of values and attitudes that emphasise the quality dimensions of the higher education experience. Internal quality assurance processes are important in developing and supporting these cultures.

In considering the relationship between external and internal quality assurance processes, there is the question of whether quality cultures are shared between the regulators and the regulated. Excessive use of metrics may produce a formalised external picture of quality which challenges the more informal quality cultures existing within institutions and subject communities. In some contexts, this may be desirable. But in others, it may be damaging. This also relates to the 'top-down' vs 'bottom-up' distinctions, to differences within quality cultures, to the 'hard' vs 'soft' approaches to risk-based quality assurance, and to whether quality assurance processes generate responses of compliance or of change and innovation.

External and internal processes of quality assurance

As noted earlier, a recent international project undertaken by UNESCO has examined the processes of 'internal' quality assurance within higher education institutions, their relationships to external processes and the capacity of both to generate change and innovation within higher education. The UNESCO message is that it is the internal institutional processes which are closest to, and can have the greatest effect on, quality in higher education. Depending on their features, external processes can either support or undermine internal quality assurance, in large part by their effects upon the cultures of quality within institutions.

The internal/external relationship and balance is part of the larger question of where authority and decision making should lie in modern higher education systems. To what extent are higher education's traditions of academic freedom and institutional autonomy still relevant? Or does higher education need to be more responsive to the changing needs of society and to reflect the interests and agendas of its users, funders and society as a whole? Should higher education institutions be regarded as distinctive organisations or as businesses like any other? The answers are probably that higher education has to be and do all of these things.

At the interception of the external and the internal are the governing boards and equivalent bodies of institutions. There is a current proposal by HEFCE to use members of such bodies as 'quality risk managers' as a way of meeting the need for external scrutiny. However, there is a distinction between 'risk oversight' and 'risk management' and a question of whether the distinction can be successfully operationalised in such arrangements. (Evidence from financial services suggests that the distinction can be problematic.)

More generally, in the countries referred to in this report, as well as in the literature on the subject, there seems to be a spread of authority and influence between different levels of decision making (e.g. state, region, institution, discipline) affecting higher education. This can generate both conflict and collaboration, compliance and change. However, if the new arrangements for higher education quality assurance within the UK are going to impact positively on the quality of higher education's processes and outcomes as experienced by students, they will need to take account of the different interests and cultures present across higher education. There are tensions which can exist between them, but there is also the potential that their use in constructive collaboration can have for the establishment of quality cultures capable of responding effectively to the diverse demands being made of quality assurance in higher education.

Annex: Brief overview of national examples

Australia

TEQSA is Australia's independent national regulator of the higher education sector.[6] It commenced operations in 2012 and represents a substantial increase in regulation for universities after a period of 'light touch' by state governments. This is an indication of developments reinforcing regulation, which is a trend much seen around the world. In its recommendations for the 2013 Review of Higher Education Regulation, Universities Australia expressed concerns for the over-regulation and compliance burden (Universities Australia, 2013; Shaha and Jarzabkowskib, 2013). At the same time, (a) there is no automatic link between TEQSA's decisions and university funding, and (b) Australia is a case where a balance is being sought between 'over' and 'under'-regulation.

These developments are reinforcing self and co-regulatory approaches within more transparent and accountable public frameworks. Australia is an example where strict enforcement policies have been moving away in favour of more negotiated regulatory outcomes. In turn, this is said to favour negotiation, compromise, and 'creativity' over sheer institutional compliance. Hence, in terms of the ideal types of quality culture described above, although it is hard to see towards what these developments are leading, it seems clear that they are meant to deter sheer responsive or even reactive quality cultures (both of which react to external demands of a strong regulatory environment).

Universities have the power to 'self-accredit' their courses, to approve their own courses through academic boards or similar bodies. However, they must do so in accordance with the Higher Education Standards Framework,[7] including adherence to the Australian Qualifications Framework. A small number of non-university higher education providers can self-accredit their courses, but most must have their courses approved by TEQSA.

Considerations about risk-based QA in Australia

TEQSA takes a risk-based approach to assuring higher education standards. The Risk Assessment Framework outlines the key steps and components of the risk assessments TEQSA undertakes of higher education providers, currently annually. Risk assessments provide a snapshot of providers across the sector to help prioritise TEQSA's focus in undertaking QA activities. The risk assessment gives effect, in part, to legislative constraints on TEQSA requiring it to follow principles of reflecting risk, proportionality and necessity as part of QA. TEQSA's risk assessments do not draw conclusions about compliance with the Threshold Standards but identify potential risks of non-compliance (TEQSA, 2016).

TEQSA focuses on four key areas in risk assessments to support the overall evaluation, comes to a risk evaluation and discusses this with the provider (*Ibid*). Within the areas there are clear indicators of risk (e.g. under students there is 'student load', 'cohorts completed', 'attrition rate', 'graduate satisfaction' etc.). The four areas of risk assessment include (a) regulatory history and standing, (b) students, (c) academic staff profile and (d) financial viability and sustainability. The risk evaluation is not merely quantitative, but employs judgement in considering the context. The first of these four areas impacts significantly, as for new entrants (without a history in higher education), and existing providers that have

[6] See: www.teqsa.gov.au

[7] The new Higher Education Standards Framework applies from 1 January 2017 (see: www.teqsa.gov.au).

been unable to satisfy TEQSA as to compliance in a recent scheduled assessment e.g. re-registration or course re-accreditation), TEQSA applies heavy scrutiny. For the rest, TEQSA nuances its engagement to fit the circumstances of the case at the time and in its context. It must be recognised that this approach sits against a legislative requirement on all providers to meet all standards at all times. Stepping away from strict enforcement and using judgement in context then opens up a greater balance. TEQSA's impact on providers is scheduled for a Ministerial review later in 2016, approximately five years after commencing its operations.

By comparison, the risk-based approach employed by the QAA in England was much less formalised. The 2011 QAA Higher Education Review method that was introduced does contain risk-based elements, mainly using the notion of 'track record' as a proxy for risk, but by no means did it constitute a fully scoped risk-based framework along the lines employed by the TEQSA in Australia. Moreover, who was making judgements on 'risk' at QAA was never clear, which defeats one purpose of risk-based regulation to make such decisions transparent, evidenced, and data-driven.

Australia at a glance (2015 or most recent)

Population (2015): 23,781,169

GDP (2015): US$1.34 trillion

GNI per capita (Atlas method, 2015)*: US$60,070

Poverty headcount ratio at national poverty lines: N/A

Admissions

Students seeking admission to higher education also receive a so-called Tertiary Entrance Score (TES). The TES is issued by the states/territories and each have their own calculation method. To qualify for a TES the student must meet certain requirements concerning the study programme and level, while the final score determines to which higher education institution the student *could* be admitted. In most cases, admission to higher education is based on the results obtained in years 11 and 12, and on the TES. Admission to Australian universities is based on a quota system. Students are allocated based on their performance in the centralised state/territory examinations, which are scaled according to the results of other students who also took examinations in the same year.

Supply

There are 'self-accrediting' universities (responsible for the quality of their own programmes and degrees), and non-university institutes of higher professional education known as 'non-self-accrediting higher education institutions'.

Providers (August 2015): 171, of which

- 53 self-accrediting (including two overseas universities)
- 118 non self-accrediting

Students (aged 18-22; in 2015): 1,606,476

* GNI per capita is the gross national income, converted to U.S. dollars using the World Bank Atlas method, divided by the midyear population.

Sources:

http://data.worldbank.org/country/australia

www.uis.unesco.org/DataCentre/Pages/country-profile.aspx?code=AUS&regioncode=40515

www.epnuffic.nl/en/publications/find-a-publication/education-system-australia.pdf

www.teqsa.gov.au/national-register

Brazil

Brazil has a strong regulatory control, justified by the need to combat 'degree mills', which emerged in a highly privatised higher education system (which in turn has been a response to the government's expansion goals, expressed in the National Education Plan 2001-2011). The National System of Higher Education Evaluation (*Sistema Nacional de Avaliação da Educação Superior* [SINAES]), was established in 2004. The recent creation of a special Secretariat responsible for Regulation and Supervision of higher education institutions and programmes is an example of this accountability and regulatory-based approach. At the same time, these policies have placed a heavy burden on the evaluation system and led the Ministry to propose (in 2012) the creation of a new specialised Institute (*Instituto Nacional de Supervisão e Avaliação da Educação Superior* - INSAES) to assure that evaluation, regulation and supervision go hand in hand and at a faster pace, and to better control institutions.

Table 2, below, reproduced from Wächter *et al* (2015), shows the evaluation indicators included in the assessment of Brazil's higher education. Without the pretence of exhaustiveness, at least the following considerations are relevant with regards to the indicators listed:

- The quality evaluation indicators 'Preliminary courses Concept' (*Conceito Preliminar de Cursos* [CPC]) was created to avoid universal evaluation of programmes in a system which was expanding apace

- With the high school exit exam's (ENEM) universalisation of in 2014, first year students are no longer legally obliged to take the National Examination of Student Performance (*Exame Nacional de Desempenho dos Estudantes* [ENADE]). Because ENADE was introduced to enable a comparison between entrance and exit performances, this development is said to weaken its overall purpose

- The ENADE questionnaire includes not only students' perceptions about their programme, but also socio-economic information such as family income, ethnic background, antecedent secondary education, parental education level, employment status, etc. As such it is also an instrument to determine the shifts in the socioeconomic profile of Brazilian campuses.

Table 2. Quality assessment in the Brazilian higher education sector: evaluation indicators

Abbr.	*Indicator*	*Scoring Range*	*Type / Objective of Evaluation*	*Inputs / Dimensions Assessed*
ENADE	*Exame Nacional de Desempenho de Estudantes* National Student Performance Exam	1 – 5	Students Performance	• Test results of selected students of the first and the last year (undergraduates)
CPC	*Conceito Preliminar do Curso* Preliminary Course Programme Score	1 – 5	Programme Evaluation Undergraduate Courses	• ENADE score for graduating students • Quality of teaching staff • Infrastructure (facilities, library, etc.) • Other programme and institutional data
CAPES	*Resultados da Avaliação da Pós-Graduação*	1 – 7 (grades 6 and 7 for PhD only)	Programme Evaluation Graduate Courses (MA/PhD)	• Academic profile • Structure of curricula • Teaching and research staff • Quality of programme degrees and performance of students • Teaching, learning and research facilities • Social insertion of programme
IGC	*Índice Geral de Cursos* *General Course Index*	1 – 5	"Institutional Evaluation" Average of all course levels at a given Institution	• CPC values • Converted CAPES values
---	*Avaliação Institucional* *Institutional Evaluation*	1 – 5	Institutional Evaluation Internal Quality Systems, Policies, Processes, etc.	• Self-Evaluation • External Evaluation (dimension see above)

Source: reproduced from Wächter *et al.* (2015), Annex 3, p. 65

The case of Brazil suggests a number of reflections and questions. First, the national concept of 'quality culture' is based on a regulated (top-down) understanding. It is hard to find mention of 'quality culture' in policy documents without direct reference to regulations pertaining to accrediting processes for accountability. **Does this mean that, at the national level, external accountability is not only deemed *part of* quality culture, but *identifies* with it?** Although it is neither sound nor prudent to answer this question conclusively, the Brazilian case does seem to indicate that a technical rationality interpretation of quality (grounded in NPM prisms which to a large extent overlook 'cultural' aspects of quality, Harvey and Stensaker, 2008) is still ascendant.

Second, **the absence of a shared system-level understanding of quality culture as a multi-dimensional concept is exemplified by the homogeneity of the scoring methodology**. The OECD (2013, p. 65) indicated that a problem of the Brazilian quality assessment is the fact that the scoring methodology is 'uniformly applied to all areas and types of programmes, and to all types of institutions'. Moreover, it treats different programmes in the same way and uses the same principles to assess all institutions, 'disregarding specific mission-related academic characteristics, like an emphasis on research or on teaching' (*Ibid*). It is hard to see how this approach could lead to a sense of belonging (i.e. quality culture as membership) rather than a responsive or reactive

organisational model of quality.[8] The case of Brazil seems to favour the 'hard elements' of quality cultures within institutions (i.e. the quality management strategies and processes and the consequences which flow from them). The 'soft' elements (values, beliefs, etc.) may exist within individual providers but the system does not appear to consciously nurture these.

Third, the quality assessment is meant to identify loci of merit and regional asymmetries in order to enable improvement. However, in fact, the **quantitative indicators used translate into rankings, market assessments and media simplifications producing visibility rather than true quality assessment** (Hoffmann, 2013, p. 657).

Considerations about risk-based QA in Brazil

The national quality assurance approach in Brazil is strongly regulated with an in-built risk-based element. SINAES comprises three main components, namely (a) programme evaluations, (b) institutional evaluations and (c) performance assessment of undergraduate students. The first two components are monitored by local assessment processes whereas the latter is supported by the ENADE. ENADE is interesting because it takes a risk-based approach but uses measured outcomes of student learning as the basis for more detailed evaluation activities rather than concepts of institutional age and reputation. Although this is temporary (the SINAES law establishes that all programmes need to be evaluated by peers), it remains an interesting mechanism because ENADE results feed the programme and institutional evaluations.

[8] Harvey and Stensaker (2008) distinguish four ideal organisational models of quality (see also Leest *et al*., 2015), namely: (a) responsive, which primarily evaluates its own practice in the light of external quality requirements and has an improvement agenda; (b) reactive, focused on avoiding external threats (e.g. a negative reputation), which sees quality as something that is 'imposed' from the outside environment and thus focuses on individual aspects of quality; (c) regenerative, typical of a 'learning organisation' in which quality consciousness is embedded in daily operations; (d) reproductive, which emphasises maintaining the status quo (changes lead to internal resistance).

Brazil at a glance (2015 or most recent)

Population (2015): 207,847,528

GDP (2015): US$1.775 trillion

GNI per capita (Atlas method, 2015)*: US$9,850

Poverty headcount ratio at national poverty lines: 7.4% (2014)

Admissions

Students must pass an entrance examination (*vestibular*), which follows successful completion of (different forms of) secondary schooling. Since 2009 an increasing number of universities use the results of the national examination that evaluates secondary education at high schools in Brazil (ENEM) selection criterion to enter into higher education by either supplementing or replacing the *vestibular*.

Supply

Brazilian higher education has a public and private sector (the latter represents 87%).
The system includes:

- Universities: 195
- University Centres: 140
- Colleges (called *Faculdades*): 2016
- Federal Centres of Tech. Education, and Federal Institutes: 40

Students (aged 18-22; in 2015): 16,380,221

* GNI per capita is the gross national income, converted to U.S. dollars using the World Bank Atlas method, divided by the midyear population.

Sources:

http://data.worldbank.org/country/brazil

www.uis.unesco.org/DataCentre/Pages/country-profile.aspx?code=BRA&regioncode=40520

www.epnuffic.nl/en/publications/find-a-publication/education-system-brazil.pdf

Ministry of Education 2014

India

Regarding the understanding of quality culture, in the context of the points mentioned above, the strong regulation and the complexity of India's higher education has some important effects on the shape of 'quality culture'. The points below are considerations based on the available information.

First, there are several regulatory bodies. The National Assessment and Accreditation Council (NAAC) is a key one (Stolarick, 2014)[9] as it accredits the vast majority of universities and colleges. But unlike other systems, the NAAC provides grades as an outcome of the assessment process (Varghese and Malik, 2016).[10] This is a matter of continuous debate, which has become even stronger since funding depends on this grading. In terms of quality culture at system level, and across the higher education institutions, this might be interpreted under different prisms. On the one hand, it suggests that **hard elements in the 'overall quality culture' are promoted**. Much is about 'following rules' to achieve a good grade on the different indicators (and reap the financial rewards attached). Soft elements, such as beliefs and commitments of individuals in their everyday professional lives, are not promoted (although nothing vetoes the idea that they might be naturally expected). In other words, institutions and academics appear to be incentivised to find ways to improve on specific measurable criteria.

Second, the rules mentioned above, as well as the discourse related to today's changes in delivery modalities (e.g. due to IT developments such as MOOCs and OERs etc. or booming cross-border education), call for new and more relevant standards and grading mechanisms, which are being discussed. This suggests a **top-down approach to quality assurance**. However, at the same time, policy documents and NAAC documents refer to promoting institutional cultures of quality by promoting institutional QA centres (see e.g. Varghese and Malik, 2016).

A third aspect, related to the issue above and which affects the way quality culture develops in the Indian context, relates to the **accrediting bodies' autonomy**. For example, NAAC is not deemed fully autonomous because of its heavy reliance on UGC funds. There have been recommendations to increase its autonomy. This issue, which is heatedly debated, has a definite role in shaping the locus of power in the system.

Moreover, similar to what was said for Brazil, there appears to be a conflict between the homogeneity of the evaluation/assessment processes and the diversity of the system. The 2015 review of Indian higher education (Varghese and Malik, 2016) calls for alternative models to fit the diversity of Indian higher education (and indicates the diversity in models present in the UK and the US as examples). As in the case of Brazil (and consistent with what is mentioned above with regards to cultures of quality) such an **approach is more likely to lead to a responsive or reactive organisational model of quality, especially since accreditation is mandatory**.

All the same, NAAC purports **to promote an institutional 'culture of quality', which it interprets as** an institution where (a) quality is entrenched in its mission and goals (that

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[9] Others include the All India Council for Technical Education (AICTE), the Distance Education Council (DEC) and the Council of Architecture (CoA), and Indian Council of Agricultural Research (ICAR), under the Ministry of Agriculture. See Report Phase 1.

[10] See report phase 1 for a description of the criteria and calculations. The details also presented at http://naac.gov.in/docs/Details%20of%20computation.pdf.

must be student-focused), (b) its activities and processes are standardised (i.e. there are documented practices), and (c) it satisfies the needs of the stakeholders (society, employers) and goes beyond to create 'customer delight' (NAAC and COL, 2006, p. 74).

Considerations about risk-based QA in India

The system is very complex, top-down and multi-agency. It applies to the whole system and there is very little left to 'risk' in the sense described in earlier sections of this report. There is a multiagency regulatory regime which continues to date, despite calls for the creation of a single national regulatory body.[11]

An interesting point is, however, **the role and quality control of colleges**. Very few of the 30,000 Indian colleges are accredited, because they must have an official relationship with a State university and the degree awarded is conferred on the student by that university (although some colleges can be given autonomous status which allows them to confer degrees under their own name but still over the seal of an affiliated university, Stolarick, 2014). Hence, universities are really meant to be the monitors and arbitrators for the colleges that are educating people, who are receiving a degree with the university's name and seal on it. In other words, the regulator bestows much trust on the universities (which must be accredited). While it is not a risk-based approach in the full sense as described by King, there is a reputational issue here. As mentioned in the main report, 'the ownership of reputation does not so much reside in the organisation but is the attribution of many other, often diverse and conflicting, stakeholders'. Given the vast number of colleges that are not accredited, there is clearly a sharing of reputational risk based on delegation of trust to universities (even though the latter are accredited in the strong top-down regulatory fashion described).

A second point concerns the quality of teaching and learning, which is a significant policy priority. The UGC implemented a special fund to assist universities and colleges 'with potential for excellence'. This initiative amounted to a disbursement of ₹57.85 crores (>£ 5.9m) to 15 universities and ₹46.87 crores (>£ 4.8m) to 96 colleges during the reporting year 2013-14 (UGC, 2014, pp. 126 ff.). This is not a 'risk-based approach to QA' but an 'excellence initiative'. However, it is a form of extra reward based on trust built on accreditation results.

[11] See www.acenet.edu/news-room/Documents/International-Briefs-2013-April-India.pdf, pp. 9 ff.

India at a glance (change data)

Population (2015): 1,311,000,000

GDP (2015): US$2.074 trillion

GNI per capita (Atlas method, 2015)*: US$1.590

Poverty headcount ratio at national poverty lines: 21.9% (2011)

Admissions

Students with a high school certificate (standard XII). However, many faculties set additional requirements for a minimum score (45 to 50%) or for subjects in which the examination was taken. Some programmes and prestigious institutions can set additional admission criteria.

Supply

Universities: 677, of which:

- 45 Central Universities
- 318 State Universities
- 185 State Private Universities
- 129 Deemed-to-be-Universities private institutions

Institutions of National Importance: 51, of which

- 16 IITs
- 30 NITs
- 5 IISERs

Institutions established under various State legislations: 4

Colleges: 37,204 (as of 2013)

Students (aged 18-22; in 2015): 118,681,476

* GNI per capita is the gross national income, converted to U.S. dollars using the World Bank Atlas method, divided by the midyear population.

Sources:

http://data.worldbank.org/country/india

http://mhrd.gov.in/university-and-higher-education

www.uis.unesco.org/DataCentre/Pages/country-profile.aspx?code=IND&regioncode=40535

www.epnuffic.nl/en/publications/find-a-publication/education-system-india.pdf

Mexico

First, over the years there has been a change in the overall relationship between higher education and Mexican society and government. This began during the reforms in the early 1990s (see e.g. Kent, 1993). Because of increase in access and in provision there have been more calls for accountability and relevance. However, in Mexico accreditation was mainly intended to give more prestige to the public sector rather than to control 'degree mills'. Private universities, which are the majority, are allowed to function with official permission without external evaluation or accreditation (interview data, May 2015). From this perspective, policy seems to promote a balance in the critical relationship between institutional autonomy and external accountability.

Mexican QA wants to incentivise universities to adopt a 'culture of evaluation' rather than of compliance, as Kent already indicated in 1993. But in the absence of meaningful rewards, Mexico continued struggling for years with the difficult relationships between accountability and institutional autonomy. Reforms after the 1990s, especially in the funding of higher education, introduced stronger reward elements. Ordinary subsidies (70 per cent) follow historical increase criteria and are based on the institutions' negotiation capacity; the extraordinary subsidies (30 per cent) are for improving performance of university staff, infrastructure, internationalisation and delivery (teaching). There are also resources for expanding and diversifying the educational offer. Interestingly, these elements coincide to a great extent to the CHEA list above (see e.g. OECD, 2005; González, 2013; Sagarra *et al*, 2016). Hence, one could argue that **in a fast developing system such as Mexico's, the regulatory and 'guiding' relationship between quality and regulation comes to the fore more strongly than in 'established' systems** such as the UK and Australia (where a greater risk-based approach is becoming common).

A second point of concern is the extent to which we can talk about a 'shared understanding' of quality culture. For Brazil, we mentioned that there is little evidence of a shared system-level understanding of quality culture, evidenced by the homogeneity of the scoring methodology. **Mexico's approach does not appear to be so uniformly structured**, though some programme-accrediting agencies do base their decisions mostly on quantitative data (for example, the accreditation agency for engineering). The UNESCO report (2006) indicates that 'when there is an emphasis on consistency, compliance or agreement on expected levels of performance, QAAs tend to develop quantitative norms'.

In addition, two points should be noted:

1 Private tertiary providers do not always get accredited. Programmes with official validity at private institutions of higher education are incorporated under a public autonomous university or are recognised by the Secretariat of Public Education (or another ministry). Degrees from incorporated programmes are issued by the incorporating autonomous university; however, transcripts may be issued by the private institution.

2 There are different results of policy nationally and internationally: 'By 2013, Mexican universities remained doing poorly in any international comparison. At the same time, government officials boasted about the progress made, thanks to the successful implementation of policies since the 1980s. As such, Mexican policies seem to produce outcomes that are different than those in other countries.' De Vries and Mendiola (2013, p. 12) explain this with third level path dependency: 'the original policy decision was erroneous, or at least highly doubtful. However, these policies have become fully entrenched in both the federal and institutional

bureaucracies, and the beneficiaries might criticise these policies, but will at the same time staunchly defend them'.

Considerations about risk-based QA in Mexico

There is no explicit 'risk-based approach' to QA in Mexico. As indicated elsewhere in this report, strong risk-based approaches are primarily evident in Australia and the U.K. However, risk-based QA is characterised *inter alia* by a strong outcome focus, and a stronger negotiated nature of the regulatory authority (leading to more cooperation than compliance). In this sense, Mexico does show risk-based elements (for example when it comes to the 'extraordinary' subsidies, based on agreed outcomes with institutions).

Moreover, one could argue that the fact that Mexico's approach does not appear to be so uniformly structured (as for example Brazil's) supports Black's (2010) and Hutter's (2005) explanation of risk-based approaches, that regulatory attention needs to focus more on where the serious risks to regulatory objectives are likely to be found within a sector, rather than 'treating everyone the same'.

Mexico at a glance (2015 or most recent)

Population (2015): 127,017,224

GDP (2015): US$1.144 trillion

GNI per capita (Atlas method, 2015)*: US$9,710

Poverty headcount ratio at national poverty lines: 53.2% (2014)

Admissions

Students must pass an entrance examination, which follows successful completion of secondary schooling.

Supply

Higher education includes: State and Federal Public Universities; Technological and Polytechnic Universities; Technological Institutes; Private Universities; Normal Schools (Education); Intercultural Universities; and Institutes of Education in Arts, Military and Health.

Higher education is offered at over 2,500 public and private Higher Education Institutions including about 2000 private providers, part of the 'Private Institution Subsystem'. Their programmes are supervised by the State, Federal ministries, Secretary of Education within the ministry, or by public Autonomous Universities.

Students (aged 18-22; in 2015): 11,533,390

* GNI per capita is the gross national income, converted to U.S. dollars using the World Bank Atlas method, divided by the midyear population.

Sources:

http://data.worldbank.org/country/mexico

http://wenr.wes.org/2013/05/wenr-may-2013-an-overview-of-education-in-mexico

www.ciees.edu.mx/index.php/ingles/whats

www.uis.unesco.org/DataCentre/Pages/country-profile.aspx?code=MEX&regioncode=40520

https://www.epnuffic.nl/en/publications/find-a-publication/education-system-mexico.pdf

Portugal

The evolution of Portuguese higher education over the past decades is characterised by two important trends, i.e. a substantial increase in student numbers (from about 75,000 in the early 1980s to over 500,000 today, according to the World Bank[12]), and differentiation of offer - specifically the development of a sub-sector of professionally oriented polytechnics (already in place in the mid-1970s). The legislative framework of the binary system was the education law of 1986.[13]

In this context, Portugal has a fairly long tradition in quality assurance, starting in the early 1990s. Quality assurance of higher education in Portugal has been based on the Higher Education Evaluation Act 1994. This act led to the establishment of CNAVES as a national agency for quality assurance of higher education. The Act was developed in cooperation with the Conference of Rectors of Public Universities (CRUP) and is the basis of the so-called 'contractual model', which means external peer review teams under the aegis of the collective higher education institutions rather than being connected to the government. This 'first generation' of QA was inspired by the Dutch model and, in particular, the placing of responsibility for the quality assurance system with an organisation representing the institutions of higher education. A consequence of this model was a strong sense of ownership and commitment to the quality assurance processes. In its 2004 review of 10 years of QA in Portugal, the European Association for Quality Assurance in Higher Education (ENQA) identified both strengths and weaknesses of this system.

Main strengths include:[14]

- The establishment of **a self-evaluation culture**, leading institutions to develop their own internal quality assurance systems as a result of CNAVES's evaluations. This means focus on quality improvement and self-reflection more than on accountability to the state.
- Appropriate methods, in compliance with European standards and practice.
- Assurance of a more equal representation of sub-sectors: initially, the system covered only public research universities; however, it subsequently included all higher education institutions: public/private and universities/polytechnics. This was accomplished through four separate evaluation councils, which ENQA said contributed to a more equal representation between the sub-sectors in the quality assurance processes (though it was not fully realised at the time of the 2004 ENQA report).
- Moreover, because of its design, the system allowed a 'soft' introduction of quality assurance as it is not so threatening to academe. However, the 'soft' element was for the preliminary accreditation of existing programmes but it was coupled with 'zero tolerance' for the ex-ante accreditation of new study programmes.[15]

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[12] http://data.worldbank.org/country/portugal.

[13] www.tojned.net/journals/tojned/articles/v04i04/v04i04-09.pdf.

[14] www.enqa.eu/indirme/papers-and-reports/occasional-papers/EPHEreport.pdf.

[15] www.eua.be/Libraries/pqc/Plenary_3_Fonseca.pdf?sfvrsn=0.

At the same time, according to ENQA, the initial system also had weaknesses. For example:

- The 'contractual model' had limited independence from higher education institutions. According to ENQA, 'involvement of representatives of the public universities in the design process indicates clearly that the methods and procedures were not defined and developed in a manner that was sufficiently autonomous and independent of the higher education institutions.[16]
- Moreover, its two-tier organisational structure meant a lack of efficiency and consistency.
- The lack of consequences or follow-up on evaluations (also because of the passiveness of the Government).
- Reliance on national experts in a small system where there is often considerable familiarity between reviewers and the reviewed.

Also as a result of these issues, the new accreditation agency (A3ES) was established in 2007. The new agency is a private law foundation, independent both from the government and from higher education institutions.[17] There were three driving forces converged to necessitate a new approach to quality assurance, namely (a) the Bologna Process, (b) oversupply of higher education and (c) diminishing public trust.

More in detail, the drivers for 'second-generation' quality assurance included the following:

- In the Bologna Process, more external assurance (accountability) became necessary.
- The higher education system had grown rapidly since the 1970s, especially in the sub-sector of professionally oriented 'polytechnics', which were partly in private ownership.
- At the same time, the traditional age groups of students (around 18-25 years) diminished in size.
- The population shifted from rural, inland areas to the major cities. Consequently, there was overcapacity of higher education supply, especially (but not only) in the polytechnic sector in rural, inland areas.
- Oversupply and for-profit behaviour of some higher education institutions diminished public trust in the higher education system. The new accreditation agency (A3ES) was faced with the task of prioritising those institutions and programmes that most threatened public trust, as it did not have the size (hence capacity) to accredit all higher education institutions in a few years' time.

The quality system overall is developed through (a) internal quality assurance, i.e. implementation by higher education institutions of quality assurance policy and procedures, (ii) self-evaluation, (iii) external evaluation, (iv) accreditation, whereby A3ES verifies and formally recognises that certain courses of study, or a particular institution meet the required

[16] www.enqa.eu/indirme/papers-and-reports/occasional-papers/EPHEreport.pdf.

[17] www.a3es.pt/en/about-a3es.

quality standards, and (v) institutional audit, i.e. the external evaluation process to verify compliance of internal systems of the institution's quality assurance with the stated objectives (the audit evaluates the processes and procedures).[18]

Reportedly, A3ES has been successful for a number of reasons[19] including, *inter alia*, the vision 'from the back office' (research centres), the lessons learnt from the CNAVES experience, which enabled a thorough academic discussion, the stronger balance between control and enhancement, and the so-called 'soft approach'.

From the perspective of quality cultures, the developments in Portugal seem to indicate a shift from self-reference (self-based quality assurance aimed at 'protecting' sector actors rather than the consumer) towards more formal accountability to the wider public.

Considerations about risk-based QA in Portugal

A3ES developed an indicator-based, computerised system to find 'at risk' higher education institutions and study programmes. This online handling of information by higher education institutions and A3ES is supposed to diminish the administrative burden of the system and provide an objective base for its decisions.

As an initial task, A3ES was charged with evaluating all currently running higher education study programmes in the country and filtering out those that did not meet the set quality standards. As there were 5,262 cycles of operation in studies when the Agency began its activity, the scale of the problem made it impossible to use a traditional system of assessment/accreditation and meet legal deadlines.[20]

For this reason, A3ES opted for the introduction of the 'preliminary accreditation', allowing it to eliminate the most obvious cases of failure to comply with the minimum standards. Institutions were asked to check their own programmes and provide evidence of their internal quality assurance mechanisms already in place. Those deemed 'at risk' were informed of the situation, but many providers proactively eliminated sub-standard programmes themselves.[21] In fact, institutions were asked, in their autonomy, to undertake a reorganisation of their training offer, indicating the study cycles in operation that they felt were adequate to be maintained in the future, and demonstrating that they had sufficient resources to meet the minimum standards.

Hence, at-risk institutions and programmes were assessed first, focusing on others later. From this perspective, Portugal is an example of a risk-based approach in quality assurance that is not based only on 'earned trust' of higher education institutions in previous years but on objective indicators, and on self-reporting by institutions.

The system seems to have worked well, on the whole. A3ES has survived as the state accreditor, notwithstanding several political changes to governments, and higher education institutions appear to recognise A3ES as an authoritative actor in the overall system.

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[18] www.a3es.pt/sites/default/files/Manual%20de%20avaliação.pdf pp. 45 ff.

[19] These are from the perspective of the agency itself, see the EUA presentation at: www.eua.be/Libraries/pqc/Plenary_3_Fonseca.pdf?sfvrsn=0.

[20] www.a3es.pt/sites/default/files/Manual%20de%20avaliação.pdf.

[21] www.a3es.pt/sites/default/files/Manual%20de%20avaliação.pdf. www.a3es.pt/sites/default/files/A3ES-Report_Amended-June-2014_SJ.pdf.

Moreover, the 2013 ENQA evaluation of A3AES found that the agency was fully compliant with all but three of the ENQA criteria and the European Standards and Guidelines (ESG). The three non-fully compliant criteria are (i) use of internal quality assurance procedures, (ii) processes fit for purpose and (iii) reporting. These were, however, 'substantially' compliant. However, the evaluation was positive overall, but makes no mention of a risk-based approach in A3ES.[22]

[22] www.a3es.pt/sites/default/files/A3ES-Report_Amended-June-2014_SJ.pdf.

Portugal at a glance (2015 or most recent)

Population (2015): 10,348,648

GDP (2015): US$198.931 billion

GNI per capita (Atlas method, 2015)*: US$20,530

Poverty headcount ratio at national poverty lines: N/A

Admissions

Students must pass an entrance examination with a minimum score of 95/200

Supply

Universities: 52, of which:

- 15 public
- 5 public non-integrated
- 4 public military and police
- 27 private institutions
- Universidad Católica Portuguesa (separate status)

Polytechnics: 57, of which

- 15 public
- 41 private
- 1 military higher education institution

Students (aged 18-22; in 2015): 552,072

* GNI per capita is the gross national income, converted to U.S. dollars using the World Bank Atlas method, divided by the midyear population.

Sources:

http://data.worldbank.org/country/portugal;

www.uis.unesco.org/DataCentre/Pages/country-profile.aspx?code=PRT&regioncode=40500

www.epnuffic.nl/en/publications/find-a-publication/education-system-portugal.pdf

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QAA1891 - June 17

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