Diversification of external quality assurance in the EHEA - Reflection following the analysis of ENQA Agency Reviews conducted in 2020-2021

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Introduction

External quality assurance (QA) of higher education has its roots in the need for accountability and enhancement of higher education institutions, particularly with regards to accountability of these institutions towards their stakeholders[1]. Agencies conduct external QA activities in accordance with the needs of the higher education system(s) they serve (and their various stakeholders), and taking into account the specificities of the context. In the last three decades, developments at national level across Europe moved at varying paces, but sped up considerably with the incorporation of quality assurance as one of the three key commitments of the Bologna Process (along with recognition and the three cycle degree structure[2]). Since then, a number of trends and developments have been observed, including varying shifts in focus between the accountability and enhancement functions of external QA[3], and in recent years a general tendency towards external QA at institutional level rather than programme level[4], although this appears to have stabilised in the past couple of years[5] and it is also clear that many agencies perform a combination of the two approaches. While some challenges remain, the implementation of quality assurance in accordance with the Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) has become an established and accepted part of higher education systems in the European Higher Education Areas (EHEA)[6].

A further commitment made in the context of the Bologna Process, which is particularly relevant as background to this paper, is the assertion that higher education institutions in the EHEA should be permitted to choose any EQAR registered agency to conduct their external QA[7]. Full implementation of this commitment is far from being a reality but many systems are

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[1] See for instance the introduction chapters of Jeliazkova, M & Westerheijden, DF 2002, 'Systemic adaptation to a changing environment: Towards a next generation of quality assurance models', Higher education, vol. 44, no. 3/4, pp. 433-448.

[2] See the Bologna Declaration, http://www.magna-charta.org/resources/files/BOLOGNA_DECLARATION.pdf

[3] See for instance Vroejenstijn AI., 1995, 'Improvement and accountability: navigating between Scylla and Charybdis: guide for external quality assessment in higher education', London: Jessica Kingsley.

[4] EQAR, 2020, 'Policy Brief: External Quality Assurance Activities within and beyond the EHEA', chart 1: Institutional, programme and joint programme reviews by year (2014-2019), p. 4, https://www.eqar.eu/assets/uploads/2020/07/PolicyBrief_EQA_WithinandBeyondEHEA.pdf

[5] Ibid, p. 4.

[6] Bologna Implementation Report, 2020, p. 73.

[7] First mentioned in the Bucharest Commiqué in 2012 (EHEA, 2012, 'Bucharest Communique: Making the Most of Our Potential: Consolidating the European Higher Education Area', p. 2. https://ehea.info/Upload/document/ministerial_declarations/Bucharest_Communique_2012_610673.pdf), and reiterated in the Yerevan Communiqué in 2015, (EHEA, 2015, 'Yerevan Communiqué', p. 5 https://ehea.info/Upload/document/ministerial_declarations/YerevanCommuniqueFinal_613707.pdf)

nonetheless opening up[8]. While this in theory creates more choice for institutions to select an agency that best fits their needs, it also creates a situation of 'marketisation' of external QA, where agencies that previously operated as a lone actor in their respective higher education systems now face the need to compete with other agencies[9].

As external QA in higher education continues to mature, discussions have recently emerged about the future and position of this activity in the higher education arena[10]. In their need to successfully deliver both functions of external QA (i.e., provision of accountability and support for enhancement) and respond to the most recent changes in higher education (e.g., the Covid-19 pandemic, the rise of micro-credentials, the launch of European University Alliances), agencies are not only further developing their existing external QA activities, but are also reconsidering their overall portfolio of activities as a whole. Making a call for 'innovation in external QA' is a further manner in which agencies are highlighting their desire to experiment with the provision of services to higher education and this topic is gaining prominence in the field of QA[11]. The purpose of this paper is thus twofold: Firstly, it aims to identify to what extent there is a discussion ongoing in QA agencies regarding the diversification of their external QA activities, and secondly, to explore the motives for, and characteristics of, such diversification.

Importantly, the paper does not seek to analyse or compare the existing portfolio of external QA activities of the agencies considered. Equally relevant, the paper does not observe the (planned) development of agencies' existing external QA activities, since this aspect of their work rather falls within the remit of the ongoing enhancement of QA activities, following their own internal quality assurance processes. Instead, the research wishes to understand whether the examined agencies are considering the possible future diversification of their external QA activities, and why they are considering expanding or changing their portfolio.

Finally, the findings of the paper should be considered within the overall context of an agency's positioning within its higher education system, funding, and mission to be fulfilled. For instance, a national quality assurance agency that is by large state funded and a sole provider of services

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[8] 21 systems in the EHEA fully realise this commitment, over twice as many as did so in 2013/14. Bologna Implementation Report, 2020, pp. 77-78.

[9] This said, it should be noted that some agencies have long operated in a competitive manner, particularly those providing external QA that forms a voluntary process for higher education institutions. For marketisation of the higher education market as such see for instance Jongbloed, B 2003, 'Marketisation in Higher Education, Clark's Triangle and the Essential Ingredients of Markets', Higher Education Quarterly, vol. 57, issue 2, pp. 110-135. For the developments in marketisation of external quality assurance in higher education see for instance Westerheijden, DF 2001, 'Ex oriente lux? National and multiple accreditation in Europe after the fall of the wall and after Bologna', Quality in Higher Education, vol. 7, issue 1, pp. 65-75.

[10] Hopbach, A & Flierman, A 2020, 'Higher education: a rapidly changing world and a next step for the Standards and Guidelines for Quality Assurance in the European Higher Education Area', in: ENQA, 2020, 'Advancing quality in higher education: celebrating 20 years of ENQA', ENQA: Brussels, pp. 29-36, https://www.enqa.eu/wp-content/uploads/Advancing-quality-in-European-higher-education-celebrating-20-years-of-ENQA.pdf

[11] See for instance Elken, M & Stensaker, B 2020, 'Innovative practices in higher education quality assurance. A study of new activities, tasks and roles in six quality assurance agencies in Europe', Nordic Institute for Studies in Innovation, Research and Education, working paper no. 7. Also Jacob, AK 2013, 'Quality Assurance and Quality Enhancement in Higher Education and Innovation', in: Carayannis, EG (eds), 'Encyclopedia of Creativity, Invention, Innovation and Entrepreneurship', Springer: New York, NY.

to higher education institutions, will reflect on the diversification of external QA activities from a position that is profoundly different from the one of a field-specific agency competing for work across the EHEA.

Research Methodology

To empirically analyse agencies' recent and planned diversification of their activities, the paper builds on the data collected from external reviews of QA agencies that have been conducted by ENQA in 2020 and 2021. These reviews have followed the evaluation methodology as set out in the Guidelines for ENQA Agency Reviews[12]. Altogether, 17 agencies[13] from 11 countries[14] have been included in this study. For the purposes of data comparability, the analysis covers only full reviews[15] against the ESG. No reviews of agencies that were conducted outside the EHEA have been included in the study[16].

The research period 2020-2021 has been selected so as to include only the latest agency reviews as coordinated by ENQA, and to provide an opportunity to examine those agencies that have already reflected on the potential impact of the Covid-19 pandemic on their external QA activities[17]. Moreover, during this period ENQA has observed intensified discussions in the quality assurance arena on the future of external quality assurance[18].

The research was conducted using the qualitative method of case study research, thus no statistical probability should be concluded following the research results. For each of the analysed agency reviews, the agency's self-assessment report[19] was screened to obtain the research data (specifically the chapter describing the agency's portfolio of external QA activities and the chapter 'Current challenges and areas for future development'). More

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[12] Available at: https://www.enqa.eu/wp-content/uploads/ENQA-Guidelines-2021.pdf
[13] External reviews of the following quality assurance agencies have been considered for this paper: ACQUIN, Germany, AI, Denmark, AQAS, Germany, ASHE, Croatia, ECAQA, Kazakhstan, FIBAA, Germany, FINEEC, Finland, GAC, Germany, HCERES, France, IAAR, Kazakhstan, IQAA, Kazakhstan, ZEvA, Germany, AAQ, Switzerland, ACPUA, Spain, ECBE, Belgium (European), NAA, Russian Federation, and UKÄ, Sweden.
[14] Belgium (an agency operating throughout Europe), Croatia, Denmark, Finland, France, Germany, Kazakhstan, Russian Federation, Spain, Sweden, Switzerland.
[15] More information about ENQA Agency Reviews, including full reviews, is available at https://www.enqa.eu/the-review-process/
[16] ENQA conducts agency reviews also outside the EHEA. In 2020, one such review has taken place in the Hong Kong Council for Accreditation of Academic and Vocational Qualifications, Hong Kong.
[17] With the exception of UKÄ, Sweden, whose self-assessment report was sent to ENQA prior to the outbreak of the Covid-19 pandemic in Europe.
[18] See AQU Catalunya, A3ES, NOKUT & QQI 2021, 'Reflecting on the future of European Quality Assurance', webinar on 27 May 2021, https://www.aqu.cat/en/Studies/conferences-and-workshops/Reflecting-on-the-future-of-European-Quality-Assurance. See also Hopbach, A & Flierman, A 2020, 'Higher education: a rapidly changing world and a next step for the Standards and Guidelines for Quality Assurance in the European Higher Education Area', in: ENQA, 2020, 'Advancing quality in higher education: celebrating 20 years of ENQA', ENQA: Brussels, pp. 29-36. https://www.enqa.eu/wp-content/uploads/Advancing-quality-in-European-higher-education-celebrating-20-years-of-ENQA.pdf
[19] ENQA Agency Reviews require an agency under review to submit a self-assessment report (SAR). The report "provides the agency with an opportunity to reflect on how it aligns with the ESG and to gather key documentation to support this. Additionally, the SAR is an opportunity to initiate the discussions on the agency's current challenges" (Guidelines for ENQA Agency Reviews, p. 10).

specifically, two sets of data were sought, in accordance with the twofold purpose of the paper: 1. The agency's reflection on the activities and plans related to the future diversification of external QA activities, including the content and characteristics of such changes; and 2. Motives and causes (i.e., internal and external drivers) of future diversification of external QA activities.

The paper does not include the agencies' reflections on their diversification of external QA through the provision of external QA of research, since this type of provision does not fall within the scope of the ESG[20], nor does it cover activities related to the external QA of other levels of education, outside higher education.

Research Results

Actions and/or plans for future diversification of external QA activities

This research shows that a large majority of the agencies in the sample reflected on the need to diversify their external QA activities in the future. In fact, the topic of diversification of external QA activities is strongly present, especially in the sections of the self-assessment reports where the agencies were asked to reflect on current challenges and areas for future development. Out of 17 examined self-assessment reports, 13 agencies mention at least once the aspiration and/or the need to further diversity their activities.

The analysed agencies state several areas to be considered when further diversifying the portfolio of external QA activities. For instance, they mention the need to develop new processes to foster the response of learning and teaching to society's current challenges, e.g., "internationalisation, growing heterogeneity of students, different educational biographies and its consequences for higher education and training, the consequences of demographic developments for HEIs and the demand for lifelong and digital learning in the future" (SAR 1). Furthermore, the analysis reveals not only agencies' changing approaches to external QA, but also the changing nature of agencies as organisations. In this regard, agencies reported to being faced with several new expectations by their governmental bodies (notably in the cases of national QA agencies), causing them to gain several new tasks and expand their scope of activities, such as "monitoring the student employability and compliance of study programmes with the needs of the labour market, the guarantee of equal access for all to higher education, the internationalisation of higher education" (SAR 4). In another example, an agency operating in a competitive market of external QA noted a need to address the diverging needs of higher education institutions, and to profile itself as a 'centre of competence for external quality assurance' (SAR 3), which could potentially give, in close cooperation with all stakeholders in higher education, "rise to new projects and approaches that would also help enhance the accreditation system" (SAR 3). These developments give rise to questions around what expectations can reasonably be placed on QA (and particularly external QA), as QA cannot be a universal panacea for managing higher education.

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[20] Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), 2015, Brussels, Belgium, p. 7.

Motives and/or causes of future diversification of external QA activities
Probably the least surprising finding of this research is that agencies are discussing the need for diversification of their external QA activities due to so-called 'evaluation fatigue' among higher education institutions and/or the need to maintain the relevance of external quality assurance. This argument appears in six out of 13 self-assessment reports that reflect on the need to diversify the portfolio of external QA activities, and primarily in the reports of national quality assurance agencies (e.g., Croatia, Sweden, Finland). As external QA in higher education matures, agencies are discussing the need to reconsider the value of their activities for higher education institutions and potentially offer new activities that are close(r) to the needs of stakeholders.

Recent major developments[21] in the external QA systems of some examined case studies (Germany, France) or at the European level (introduction of European University Alliances through the European Universities Initiative[22]) are another identified cause of possible diversification of external QA activities. As one agency notes, "the major change […] simultaneously opens new horizons and possibilities to the agencies" (SAR 1). Specifically in the case of Germany, agencies are facing increased competition to provide programme and system (institutional) accreditations, as these can be conducted by any EQAR registered agency that has also been approved by the German Accreditation Council. In a shrinking market where higher education institutions shift from programme to system accreditations and therefore undergo far fewer processes, the German QA agencies have been forced to consider alternative offers in external QA to the existing types of evaluations.

Furthermore, in Germany, the option for agencies to provide so-called 'alternative procedures'[23] provides another example of future diversification of external QA, where institutions are given an opportunity to consider alternative paths toward accreditation other than programme or system accreditation. In line with this, one agency listed as an opportunity the development of a procedure that will advise, support and above all encourage higher education institutions to self-engage in these new types of activities.

Next, several new dimensions to external quality assurance activities are being explored, such as the social dimension of higher education and engagement in implementation of Sustainable Development Goals[24]. Following this, agencies are considering developing new external quality assurance activities that will evaluate to what extent institutions consider these new dimensions into higher education. One agency provides an example of a new external quality assurance activity under development that "must serve as a model for quality assurance initiatives [of that agency] oriented by the Sustainable Development Goals, promoting gender equality or labelling non-discriminatory practices in research and higher education" (SAR 14).

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[21] In Germany, the entry into force of the Interstate Study Accreditation Treaty in 2018, and in France, the Research Programming Law recently giving HCERES the "responsibility for coordinating evaluation bodies and validating the evaluation processes of other evaluation bodies, such as the CTI and the CEFDG" (SAR 9).
[22] More information is available at: https://ec.europa.eu/education/education-in-the-eu/european-education-area/european-universities-initiative_en
[23] See https://www.akkreditierungsrat.de/de/akkreditierungssystem/alternative-verfahren/alternative-verfahren (in German)
[24] See https://sdgs.un.org/

Digitalisation of higher education provision gained significant momentum due to the Covid-19 pandemic since early 2020. Following this, one agency mentioned an opportunity to develop an accreditation procedure that will specifically evaluate all aspects of 'digital in education'. More specifically, the agency explains that this accreditation will evaluate "the quality of the strategy of the digitalisation in the case of teaching and learning, personnel resources, technics, didactic layout and the quality assurance of digital programmes" (SAR 6).

The relevance of big data, data management, and automation of information flows between various actors in higher education (institutions, governmental bodies, students and QA agencies) is another driver in diversifying the activities of QA agencies. In the context of this research, this identified driver should be analysed in relation to the above discussed changing nature of agencies as organisations. Agencies reported plans to enlarge their portfolios of activities, which might or might not result in entirely new external QA activities, but for sure will result in a wider scope of (existing) activities.

Reflections

The above examples provide a practical illustration of how QA agencies are diversifying their EQA activities in order to meet the most pertinent challenges in their specific contexts. However, they are also a reflection of a general trend of development in external QA, namely the increasing calls for innovation and diversification in EQA, some aspects of which have been amplified in the past 18 months as a result of the Covid-19 pandemic. The following paragraphs offer some brief reflections on the drivers behind the currently observed changes.

The European QA framework

The starting point for external QA in the EHEA is the ESG. The current version of ESG came into effect in 2015. Although this seems not so long ago, the formal request for a revision came from the EHEA Ministers for Education already in 2012[25] and the subsequent revision process involved substantial stakeholder consultation, including on an almost-final draft version of the proposed new text. As such, stakeholders were well aware of the changes and started to adapt to them already well before the formal endorsement of the final version in 2015. Furthermore, for some agencies the 2015 version of ESG contained elements that required significant changes to their standards and processes, whereas for others very little adjustment was needed, particularly as the most substantial changes to the ESG were to Part 1, which relates to internal QA. For those latter agencies there has not been a period of adaption to the new standards, and instead they have already been looking beyond them. As a result of this and other drivers (see below) there is an ongoing discussion regarding the extent to which the current ESG allow for flexibility beyond or outside of the established

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[25] EHEA, 2012, 'Bucharest Communique: Making the Most of Our Potential: Consolidating the European Higher Education Area', p. 2. https://ehea.info/Upload/document/ministerial_declarations/Bucharest_Communique_2012_610673.pdf

traditional formats of external QA[26]. While the E4 Group[27] (as some of the key European stakeholder organisations and co-authors of the ESG) have recently reiterated the scope for flexibility and innovation afforded by the ESG, they also recognise that a further revision may soon be needed in order to reflect the changing nature of the higher education landscape[28]. Despite the importance of the European framework, it should also be noted that many agencies (though by no means all of them) primarily serve a national purpose and are therefore subject to and must respond to country-specific drivers and pressures, including political developments. A recent study by Elken and Stensaker noted that agencies 'tend to have a strong national orientation and where they are still under substantial control and influence by national authorities'[29] and that this might result in a 'possible growing tension between the domestic and European roles and responsibilities of quality assurance agencies'[30].

Maturity of external QA
One of the key motivations for many agencies to develop or diversify their external QA processes is the need to ensure continued relevance and added value for the institutions and programmes within their jurisdiction. In systems with a long history of external QA, institutions and programmes have already been through multiple rounds of external QA. Agencies recognise that without changes in the approach each subsequent round has potentially less impact and risks becoming a bureaucratic exercise and that they therefore have to offer something different (for example ASHE, UKÄ and FINEEC). Furthermore, for agencies that operate in an 'open market' where institutions or programmes are not restricted to a single QA agency, agencies need to develop a competitive advantage by offering something that sets them apart from others operating in the same system or field (for example IAAR, AQAS and ZEvA).

This issue is seen not only at the level of QA agencies, but also in the reviews of agencies themselves. ENQA, as the main provider of agency reviews in the EHEA, has recently revised its own review guidelines and in 2021 has diversified its services by launching, in cooperation

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[26] See for example Hopbach, A & Flierman, A 2020, 'Higher education: a rapidly changing world and a next step for the Standards and Guidelines for Quality Assurance in the European Higher Education Area', in: ENQA, 2020, 'Advancing quality in higher education: celebrating 20 years of ENQA', ENQA: Brussels, pp. 29-36, https://www.enqa.eu/wp-content/uploads/Advancing-quality-in-European-higher-education-celebrating-20-years-of-ENQA.pdf
and Loukkola, T 2020, 'European quality assurance framework: why all the attention?', https://eua.eu/resources/expert-voices/188:european-quality-assurance-framework-why-all-the-attention.html,
and AQU Catalunya, A3ES, NOKUT & QQI 2021, 'Reflecting on the future of European Quality Assurance', webinar on 27 May 2021, https://www.aqu.cat/en/Studies/conferences-and-workshops/Reflecting-on-the-future-of-European-Quality-Assurance
[27] Consisting of ENQA (European Association for Quality Assurance in Higher Education), EUA (European University Association), EURASHE (European Association for Institutions in Higher Education) and ESU (European Students' Union).
[28] E4 Group, 2020, 'The ESG in the changing landscape of higher education', https://www.enqa.eu/wp-content/uploads/E4-statement_The-ESG-in-the-changing-landscape-of-higher-education_Final.pdf
[29] Elken, M & Stensaker, B 2020, 'Innovative practices in higher education quality assurance. A study of new activities, tasks and roles in six quality assurance agencies in Europe', Oslo: NIFU, p. 34. https://nifu.brage.unit.no/nifu-xmlui/bitstream/handle/11250/2720712/NIFUarbeidsnotat2020-7.pdf?sequence=1&isAllowed=y
[30] Ibid., p. 8

with EQAR, a methodology for targeted reviews[31], which will be available for agencies that have already had at least two consecutive successful reviews against the ESG. This new approach is intended to reduce the burden on agencies by looking only at specific standards of the ESG as well as putting more focus on the enhancement aspect of the review process (as opposed to the compliance aspect).

Covid-19 pandemic

It is probably fair to say that QA is not a fast-paced field. Changes in approaches to external QA, whether introduced at the initiative of an agency or at the behest of other authorities, take time to introduce and usually (and quite correctly) follow substantial periods of evidence gathering and stakeholder consultation, with pilot and transition phases. While the Covid-19 pandemic caused unprecedented challenges for QA agencies, it also demonstrated that changes can be agreed and implemented rapidly when needed. It also presented an unusual opportunity for innovation, with agencies forced to rethink their usual processes, including the standard timelines, the format of, or even need for, a site visit, and reflection on which are the essential and non-essential elements of their work. In some cases, the suspension of the usual regulations for accreditation or other external review have allowed for experimentation with activities and formats that might otherwise have taken years to develop. It is important to note here that a clear distinction must be drawn between the emergency response to the consequences of the pandemic and any subsequent strategically chosen developments to change previous formats. Nonetheless, it is clear that many agencies are evaluating the lessons learnt over the past 18 months and are refining some aspects of the emergency actions for incorporation into their regular processes[32]. While this may not specifically fall under the definition of 'diversification' of external QA activities (as it is rather an adaptation of existing activities) it nonetheless appears to have opened minds to the potential for change.

Developments in European higher education

In order to remain fit-for-purpose, external QA must keep pace with broader changes in European higher education. Ongoing developments that must be reflected in approaches to external QA include: the European Universities Initiative and other forms of internationalisation that deepen universities' strategic cross-border cooperation, increased prominence of micro-credentials and other units of learning that respond to calls for flexible study paths and life-long learning, digitalisation and online education (which has been on the agenda for many years but is now at the forefront due to the Covid-19 pandemic), as well as attention towards other cross-cutting issues such as diversity and inclusion, sustainability, and increasing links and interaction between the three higher education missions of education, research and service to society. External QA has traditionally focused on learning and

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[31] https://www.enqa.eu/wp-content/uploads/Guidelines-for-ENQA-Targeted-Reviews.pdf
[32] See for example presentations and discussions from two ENQA webinars on the topic of online quality assurance, which present case examples from ENQA members and affiliates. Part 1, April 2021, https://www.enqa.eu/events/enqa-online-members-forum-online-quality-assurance-experiences-from-enqa-members/ and Part 2, May 2021, https://www.enqa.eu/events/enqa-webinar-online-quality-assurance-experiences-from-enqa-members-part-2/.

teaching, and indeed the ESG apply specifically to this area of activity. While many agencies have for some time also looked at higher education research activities, others are finding this area now being brought into their remit (e.g., UKÄ). Additionally, some agencies have explored how they can specifically support and evaluate universities' work in sustainability and societal engagement (for example, FINEEC and ACPUA).

Some of these developments have resulted in revision of or addition to agencies' own standards, whereas others have prompted agencies to add further services to their portfolios, including branching into consultancy services or offering other review options that are not specifically related to the ESG or system-level education standards. This demonstrates not only the changing nature of external QA activities, but also the changing nature of quality assurance agencies as organisations. In the quest to remain relevant and responsive (and in some cases, competitive), agencies may start to look quite different and the diversity of profiles across the EHEA is likely to become even more pronounced.

Conclusions

The information gathered from the analysis of the self-assessment reports by agencies used as the basis for this paper shows that QA agencies are actively considering the options to diversify their portfolio of external QA activities. The motives for this include the need to remain relevant and useful for higher education institutions, and changes in the QA systems in which they operate. Both of these aspects are compounded in some cases by an opening up of the QA market in their respective systems, meaning some agencies find themselves working in a competitive environment. Furthermore, there have been many broader developments in higher education in the EHEA, to which QA agencies are trying to respond through their activities.

In parallel, there is evidence of a growing discussion in the QA community about the room for innovation within the current QA framework of the EHEA. Although European stakeholder representatives and policy contributors, such as ENQA, have long talked about the diversity of external quality assurance approaches across Europe, it is nonetheless possible to observe a convergence around a handful of most common approaches (external QA at programme or institutional level, emphasis on compliance or enhancement, generic or subject-specific approaches etc.[33]). Furthermore, following the guidance set out by the ESG, external QA is largely based on the peer review approach in the four-stage format of self-assessment, external review usually including a site visit, report, and follow-up[34]. Agencies that move away from this format have risked exclusion from the groups of approved agencies in the EHEA (i.e. ENQA membership and EQAR listing)[35]. This demonstrates an ongoing tension

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[33] For other reflections on convergence and diversity in external QA see Hopbach, A & Flierman, A 2020, 'Higher education: a rapidly changing world and a next step for the Standards and Guidelines for Quality Assurance in the European Higher Education Area', in: ENQA, 2020, 'Advancing quality in higher education: celebrating 20 years of ENQA', ENQA: Brussels, pp. 29-36, https://www.enqa.eu/wp-content/uploads/Advancing-quality-in-European-higher-education-celebrating-20-years-of-ENQA.pdf
[34] See ESG Standard 2.3.
[35] A prominent example was that of the Swedish quality assurance agency in 2013. Their ENQA membership was restored in 2021.

between the desire to experiment and innovate and the wish to remain part of the ENQA and EQAR structures, with the legitimisation that that bestows, not forgetting that external QA in line with the ESG is one of the key commitments of the Bologna Process to which national governments have agreed.

All this raises a question about when are conditions right for innovation to be beneficial rather than disruptive? At what point does the balance tip in favour of the desire to shake up the status quo? The scope of this paper does not allow for a more detailed exploration of this, but it could form the basis for further investigation, including the application of a theoretical framework based on organisational theory.