

**Are European quality assurance agencies reviewed according to the European Standards and Guidelines?**

Paper presented in track 1 at the

**31st Annual EAIR Forum in Vilnius, Lithuania**

**23 to 26 August 2009**



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### ***Abstract***

The emergence of the European Standards and Guidelines (ESG) for Quality Assurance has been seen as an important step towards realising the European Higher Education Area by creating more transparency and accountability in the area of quality assurance. The ESG also include standards as to how quality assurance agencies should be reviewed. In a meta-analysis of the reviews undertaken of quality assurance agencies, this paper explore to what extent the ESG is having an impact on the conducted reviews.

## **Are European quality assurance agencies reviewed according to the European Standards and Guidelines?**

### **Introduction**

The European Standards and Guidelines (ESG) (ENQA 2007) are in principle a set of guidelines on how to conduct different aspects of quality assurance in higher education. The standards deal with different aspects of quality assurance (QA): how to conduct QA internally within higher education institutions, how external QA should be conducted, and not least, how external agencies responsible for external QA should be evaluated themselves.

The emergence of the ESG is an interesting development in higher education as it can be seen as a means to balance the challenges associated with internationalisation, transparency and accountability on the one hand (Fisher 2004), and the national characteristics, aims and responsibilities for higher education on the other (Huisman & Currie 2004). The idea is that the ESG should contain guidelines and standards that should result in a more joint understanding of how processes of quality assurance should be conducted, while allowing for national and institutional particularities and essential characteristic. For example, within the ESG any preferences to particular evaluation and assessment methods are absent. In other words, the means matter less than processes, and prescriptions about how evaluations should be conducted in general dominate.

However, although the ESG is not written and meant as a set of legally binding regulations and requirements opening up for national and local interpretations of the guidelines and standards offered, there are also expectations that the ESG should have an impact within the sector. In this respect, the reviews of the various agencies responsible for external QA are of particular interest. Since the agencies usually are a member of ENQA, the body responsible for developing the ESG, one could expect that the guidelines and standards would have more significance and importance, and that, as a consequence, national agencies would be evaluated more in accordance with the international standards paying less attention to national characteristics and traditions. On the other hand, agencies have in general strong national links, and one could also argue the "European dimension" in quality assurance in practice has not been very strong (Westerheijden 2007).

Hence, studying how the ESG is being understood and implemented with respect to the review of national quality assurance agencies is an interesting area for more in-depth analysis. First, meta-analysis of the reviews undertaken can shed more lights on the actual impact of ESG in practice.

Second, it can indicate the degree of national “resistance” or “adjustments” to the ESG. Third, it can identify the areas in which agreements/disagreements exist that may impact on our understanding of what constitutes “quality” when assessing agencies. Fourth, it can shed light on the usefulness of ESG in practice, and hint at areas in which the ESG can be improved.

With this background, the main research question in our study is to *what extent the ESG is guiding the external reviews of national quality assurance agencies?* To answer this question, the study will analyse how the different dimensions in the ESG are used as terms of reference in the reviews, whether it is possible to identify dimensions that are interpreted as being more important than others, and whether one can identify areas in which a joint understanding and common interpretations of the ESG are developing.

The current study can be considered as a follow up of earlier studies on external quality assurance reports (see Stensaker 2000; Prøitz *et al* 2004) aiming at improving our understanding of how different quality assurance processes actually function in practice, and their implications for our understanding of quality and how quality is achieved in higher education.

### **Making sense of the ESG**

The ESG could be analysed from a number of perspectives. However, a starting point for developing an analytical framework is that standards in general should be considered as being part of the governance framework of the EU (Streeck 1996). Although the ESG is directly linked to the Bologna process, and as such, not under the EU domain, the approach of using standards as a policy instrument is quite familiar (Brunsson *et al.* 2000). Hence, the ESG can be seen as part of the ‘neo-voluntarism’ and ‘soft law’ so typical for EU governance. Since the possibilities to impose binding regulations, especially within higher education, are fairly absent, various voluntary approaches are the only way forward. Standards can in this perspective be seen as a form of governance without government (Brunsson *et al.* 2000).

It follows from this that there may be numerous actors and organisations involved in both standard setting and standard following activities, and that the absence of ‘government’ also implies that these processes can be very open and dynamic. The latter is not least underlined by the fact that the ESG is intended to be an all-encompassing framework influencing institutions and agencies but also national authorities (Hopbach & Serrano-Valerde 2007).

In such an open and dynamic process, standards, in general, and the ESG, in particular, may have different functions. While some may argue that the

standards such as the ESG reflect basic good practise (Hopbach & Serrano-Valerde 2007: 6), other point out that standards are input to best practise, emphasising that best practise is not so much imitated from a particular setting as formed during implementation (Sahlin-Andersson & Sevón 2003: 260).

Hence, standards should not be taken for granted but analysed empirically to better understand their role and function. Based on this distinction between seeing standards as either output or input, three different interpretations of the ESG may be sketched (Erlingsdottir & Lindberg 2005): First, the standards may function as a vehicle for isomorphism in which structures and practises becomes more similar. This interpretation is based on a linear adaptation process emphasising that standards are copied 'as is'. Standards are conceived as a form of technology that travels unaffected by social influences.

Second, the standards may also result in isonymism, the possibility that there is a distinction between what we name a certain practise, and the practise itself. Isonymism is then a label we use for situations where the same name is used to cover different practises. For example, Prøitz *et al.* (2004) found that the term accreditation may be used for different practises, although the term initially reflects a more control-oriented governance mode (Burke 2005).

Third, standards may also pave the way for isopraxis, the possibility that similar practises have different names. For example, while it today is common for external quality assurance agencies to conduct evaluations of the internal quality systems of higher education institutions, this form of evaluation can be labelled as audits, evaluations or accreditations depending in various countries.

Hence, in principle the role and function of the ESG can differ considerably, which also opens up for discussions as to what extent the public can have trust in the standards (Bachmann 1998). The trust issue is interesting in that it indirectly links potential stakeholders to the ESG, and whether and how the ESG can be said to be adjusted to the views of particular stakeholders. We will return to this question in the latter parts of the paper.

## **Data and methods**

Our data stem from the external reviews that have been undertaken of ENQA member agencies since the establishment of the ESG in 2005<sup>i</sup> (see full list in annex 1). These reviews can be mainly divided into two groups. First, reviews that are initiated and organised at the national level. Second, reviews in which ENQA has had a coordinating/organising role. In this paper,

both types of reviews are included in the analysis.

The analysis of the reports can be divided into two parts. First, the reports have been compared as to their format, size and methodological point of departure. In this way, we want to shed light on whether reports have a similar structure. However, since the structure might cover variations in content, we have also analysed how conclusions in the reports are reached, and the evidence drawn upon for reaching such conclusions.

When analysing written reports only, one should be careful in drawing extensive conclusion on the overall review process. For example, one could claim that an analysis of the reports will not be sufficient as to uncover disagreements and contested issues within the group undertaking the review (see also Westerheijden 1990), and that written reports does not provide any insights as to the more informal dialogue taking place during the process between the external review committee and the agencies and their stakeholders. Still, since the reports are the official outcome of the review process, and since they are the basis of which formal decisions are taken, their importance should not be underestimated. As such, the external review reports can be considered as a very important element in the implementation of the ESG in Europe.

### **The ESG and the ENQA approach to reviews of external agencies**

Following the Leuven meeting of Ministers, 2009, ENQA affirmed, *inter alia*, that:

3. The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) form the overarching framework of quality assurance in the EHEA. The ESG recognise the primacy of national systems of higher education and the importance of institutional and agency autonomy within those national systems. The four-year experience in the implementation of the ESG has provided clear evidence of their usefulness and applicability in various national contexts and within differing organisational missions and setups.
4. The purpose of the European dimension to quality assurance is to promote mutual trust, improve transparency and provide reliable information. In this respect, the external evaluation of quality assurance agencies, foreseen by the ESG and now implemented in many of the signatory countries with the support of ENQA, is crucial. The external evaluation of the quality assurance agencies, in accordance with the ESG's recommendations is also the cornerstone of the European quality assurance register for higher education (EQAR), which will act as an additional location of information about trustworthy agencies. In relation to this, the autonomy of quality

assurance agencies within national HE systems is a necessary condition to the full exercise of their responsibilities, notably with regard to provision of accurate and consistent information to the general public.

Membership of ENQA is contingent on fulfilling specified membership criteria. These criteria have emerged over time and are now identical to the *European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)*. The ESG were adopted by the ministers responsible for higher education in the 45 Bologna signatory states in Bergen in May 2005. There have been three editions but changes have only been of layout and section numbering and the content of the third edition (2009) remains the same as that of the first.

The ESG have three sections, and the third section specifies, *inter alia*, that agencies should themselves be reviewed. A separate document has emerged specifying how this review process might be undertaken. The *Guidelines for National Reviews of ENQA Member Agencies* (ENQA, 2006, p.1) states:

The membership regulations of the European Association for Quality Assurance in Higher Education (ENQA) require all member agencies to undergo an external review at least once every five years. External reviews are expected to include consideration of how far agencies meet the criteria for Full membership of ENQA. These criteria are identical with the *European Standards and Guidelines in Quality Assurance (ESG)* in the European Higher Education Area, adopted by ministers in Bergen in 2005. In line with the principle of subsidiarity which underpins the ESG, the five-yearly reviews will normally be conducted at national level.

It adds that there are likely to be two types of nationally co-ordinated external reviews: those it calls Type A, the sole purpose of which is to fulfil the periodic external review requirement of ENQA membership; and Type B, that undertakes a fuller examination of the agency and includes ENQA membership requirements as just one element. In either case, though, ENQA indicate that 'certain elements will be required in a national review for it to be acceptable to the ENQA Board as a vehicle for demonstrating that the agency has met the Full membership criteria'. These are listed as:

- the management of the review process must be completely independent of the agency itself;
- all parts of the of the review's management and process must be transparent and therefore easily open to examination by the ENQA Board;

- the report produced must be sufficiently detailed to provide satisfactory assurance for the ENQA Board of the robustness of the review;
- the report must provide sufficient, verified, information which clearly shows that the ENQA membership criteria have been met. (ENQA, 2006, p. 3)

ENQA further specifies how the process should proceed through a six-phase process:

- Notification to ENQA
- Formulation of terms of reference and protocol for the review
- Nomination and appointment of a panel of reviewers
- Production of a self-evaluation report by the agency under review
- A site-visit by the panel of reviewers to the agency under review
- Production and publication of a final report

Based on the above, one could argue that external reviews of ENQA members agencies could be quite diverse — both in structure and in content. External reviews could be undertaken for different purposes, by different actors, although there are at least some methodological requirements (site-visits, etc). However, as mentioned above, ENQA also developed some additional guidelines for the external review of agencies that may be said to provide a more ambivalent view on the possible discretion in a review process. Hence, the *Guidelines for National Reviews of ENQA Member Agencies* concedes that there is 'no single ideal model for the composition of a review panel' but also states that:

The key requirements, however, are that members of the panel should be totally independent of the agency under review and have a sufficient level of knowledge, experience and expertise to conduct the review to a high standard. A review panel will be able to perform its independent function most successfully when it comprises members who between them have a wide range of professional experience of higher education and quality assurance; this might well include:

- quality assurance experts from outside the system being reviewed;
- representatives of higher education institutions;
- student members;
- stakeholder members (for example, an employer).

International member(s) on the panel can provide very valuable insights for the review and help to establish its credibility, and it is therefore recommended that at least one member of the panel should be a quality assurance expert from beyond the jurisdiction of the agency under review.

The review panel should include a member who will act as secretary to the review.



No current or recent former member of staff of the agency under review should take part in the review panel or act as secretary to the review.

Nominations of experts could be sought from a wide range of sources—including agencies, stakeholders, local authorities, etc.—but the selection process must be carried out by a third party (i.e., not by the agency being reviewed), to preserve the integrity of the process. (ENQA, 2006, p. 4)

While being labelled as guidelines, the detail and explicit nature of how the process could be designed could easily be interpreted as expectations that those designing the external reviews should follow. In the following sections, we will take a closer look as whether this is the case.

### **Tendencies towards isomorphism?**

When analysing the structure of the external review reports there are a number of indications that the ESG is a powerful driver towards isomorphism in external quality assurance. First, the majority of the reports are structured in a very similar way in that the ESG standards are referred to, that evidence of compliance is presented, and that the external review committee states whether the standard is met, partially met, or not met at all. Those reports that do not follow this set-up were mainly written in 2006–2007, while later reports seem more similar in their set-up. Typical examples of early reports that have a set-up deviating from later reports are the external reviews of ACQUIN in Germany and the external review of the Swedish Agency for Higher Education. Later reviews that have a much more standardised set-up, include the French Commission des Titres D'Ingenieur and the Romanian ARACIS. These findings are very much in line with the expectations related to isomorphism which states that a particular organisational field will become more isomorphic over time.

A second indication of isomorphism is related to the way in which evidence is collected and analysed. Although a variety of methods can be applied to collect information and evidence about the functioning of a particular quality assurance agency, the main method chosen is the one mentioned in the ESG where the external review committee visits the agency for two-three days, and meets with representatives of staff and external stakeholders. When the external review committees reach their conclusions these are normally based on evidence from these visits, and/or the self-evaluation reports provided by the agencies themselves. Existence of more comprehensive data-sets including broader surveys, independent or third-party information, is rarely used at all.

A third indication of isomorphism is related to the composition of the

external review committees. Most of the external review committees are composed in line with the suggestions in the ESG concerning various stakeholder representatives, not least with respect to students. Interestingly, one can also notice a trend in that a substantial number of representatives have close links to the E4-group (ENQA, EUA, ESU, EURASHE), either through working in these organisations, or being associated with organisations that are E4 members.

A final example of isomorphism is related to the fact that the ESG as such seems to be very dominant as a review procedure in Europe. The requirement in the ESG that external quality assurance agencies should be reviewed every five years is apparently being taken very seriously, and accepted almost in a rule-like fashion. Although national governments through the bi-annual ministerial meetings of the Bologna-process have legitimised and accepted the ESG as an important vehicle for quality and accountability in Europe, each country could in principle also use other means and ways for evaluating their national quality assurance agencies, and to enhance trust and transparency in their higher education systems. However, this option is not used in practice.

### **Tendencies towards isonymism?**

While tendencies towards isomorphism clearly can be noted, there are at the same time also several examples of isonymism in the external reviews of the external quality assurance agencies. While being labelled as part of the standard evaluation of national quality assurance agencies, different practices can be noticed in several areas. A first example is how the notion of 'evidence' is understood and dealt with during the reviews. In some of the external review reports, the evidence provided can be quite implicit, and formulated in a way that provides few hints as to the substance of the data the conclusion is built upon. For example, the external review of ACQUIN in Germany is summarised in a 15 page report in which the evidence must be characterised as very brief and abstract. Other reports are substantially longer, and considerably more explicit.

However, different practices can also be noticed in other ways than in the lengths of the reports. By comparing some randomly selected external reviews (see table 1, annex), a finding is that the focus of the reports varies considerably, as well as the degree to which the standards and guidelines are discussed. For example, while some external reviews assess whether the staff of the agency under review is competent, other reviews only assess whether the agency has a sufficient number of staff. Such differences in practice can, of course, be the result of the different objectives of the external reviews but it can also be the result of the different roles and activities of the agencies themselves. Furthermore, it can also be the result

of very different review committees focusing on different aspects of the work of the agencies, or it may simply be the result of guidelines and standards that opens up for different interpretations of how certain conclusions should be reached.

In the external reviews undertaken, the latter two possibilities can be illustrated quite easily. For example, while the external review of AHPGS in Germany was fairly critical towards how the agency selected panel members for accreditations undertaken by the agency, and ended up with the conclusion that compliance was only 'partially fulfilled' (p. 12). The external review of AQU in Spain can also be said to be quite critical of the selection procedures of panel members, but still the conclusion was that the agency was in 'substantially compliance' with the ESG (p. 19-20).

Similarly, some reviews explored all three parts of the ESG (even though the first part is about institutional internal processes), some the second and third parts and some simply the third section that related to the review of the agency themselves. The 'digging down' to the layers below, occurred because the ESG cross-refer to the lower level in the first standard of each of parts 2 and 3.

Regardless, all reviewed agencies listed in table 1 obtained full membership of ENQA, showing that the flexible interpretations of standards and guidelines are still within accepted limits, and that very diverse content still seems to provide a basis for a positive outcome of the review.

### **Tendencies towards isopraxism?**

Our analysis has also identified some possible examples of isopraxism in the external reviews of ENQA-members. First, although we can indeed notice a substantial number of international reviewers taking part in these exercises, we haven't found a 'core group' of people that frequently are included in such processes. Indeed, there are international experts that have participated in more than one external review, but even this is quite rare. In this way, one can argue that identical practices (related to the structure of the report, and the methods used), may develop even without the same people being present during the process. Hence, the ESG seem to function as a standard-setting device of its own, without having to appoint a specially trained cadre of 'inspectors' for this purpose.

Of course, a possible follow up question might well be whether the absence of such 'inspectors' actually means that the whole external review process is providing a real critique of the agencies, and perpetuates a particular approach to quality assurance?

In this matter, it does seem that the ESG and ENQA is not totally in line with each other. While the ESG has been developed to provide trust and transparency both within and across national borders, ENQA also emphasise that all activities related to quality assurance should respect the 'fitness-for-purpose' principle – a statement recently underlined by ENQA in a position paper to the Leuven meeting in 2009.

There are two major problems with this. First, if indeed fitness for purpose is an appropriate method, why should there be a prescriptive approach (standard) about how to evaluate it. It seems that in this case the methodological cart has been put before the purpose horse. Second, there is an epistemological issue about fitness for purpose; that it is not really a definition of quality as it does not get to the crux of the notion of quality in as much as it merely examines process of quality assurance rather than the transformational element at the heart of quality. In short, does not get close to an examination of the student transformational learning experience (Harvey, 2006; Harvey and Newton, 2007). The fitness for purpose approach, even if not predetermined, asks essentially procedural compliance questions rather than questions about intrinsic quality.

However, the analysis of the external reviews undertaken discloses that the same practice actually covers two rather different intentions or purposes. While one could assert that this is an implication of the distinction of type A and B reviews, where the first is only about the compliance to the ESG, while the other type can also address issues of effectiveness, quality and relevance, our analysis indicate a more nuanced picture. For example, in the external review of the bi-national NVAO system-wide comments were also made concerning the formal status of higher education institutions, and how the flexibility of universities can be a comparative advantage to more effectively serve the society (p. 63). This is s recommendation that does not address the agency as such, but are targeting the system and the policy level in particular. Still, there are no doubts that the type A reviews that are currently in majority have a focus on 'assurance' prior to that of 'quality': although the latter probably would be the important issue for most people.

### **Some closing reflections on trust and transparency**

As our analysis suggests, it is debatable as to whether, in practice, the process of external review is as transparent as it appears in theory. On a formal level, the various boxes are ticked but whether this really provides any real insights into the processes is a moot point. The reviews do suggest that all relevant actors are no longer 'working in the dark' and that sets of procedures are codified; either through the establishment of a certain practice, or through the establishment of a certain label covering various practices. However, what is less clear is whether the increasing formalisation

and codification provide any clear insights into ways audit, assessment or accreditation decisions are made in practice. The risk is that trust and transparency indeed is created; but only on a macro-level. The fact that external reviews are increasingly including people with close relations to the E4-group can indeed increase trust and transparency within this group, and between the organizations that are associated with the E4.

Whether the ESG is creating trust outside the E4 group is another question. It is often stated that quality assurance is about providing transparency and information to the public in general but the main problem with the ESG as they are formulated today is that it is 'assurance' that has priority over 'quality'. In this way, the ESG is clearly becoming an important an example of how 'governance' indeed can be possible without any 'government' supporting it.

However, the success of the ESG as a supranational governing tool can also have possible disadvantages. For example, one could argue that the popularity of international ranking lists of higher education institutions is due to the fact that they, at least on a symbolic level, address 'quality' directly. The formal set-up, the many standards and guidelines, and the codified language in the external reviews of quality assurance agencies can in comparison easily be seen as a more bureaucratic and 'red-tape' procedure not providing real value for money for the society in general. The weight currently given to formalities in the external reviews of national agencies i.e., how review committees are selected and appointed, on the methods used, and on a very narrow understanding of what constitute proper 'evidence', represent a potential problem for the ESG in establishing trust and transparency in a broader societal perspective. Based on our analysis, it is perhaps time to give more attention to issues that relates to the overall impact of agencies in the systems of which they work.

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