Revising the ESG: Launching the Process

What a Consultation Can Decide and What It Cannot

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The Standards and Guidelines for Quality Assurance in the European Higher Education Area are being revised, and the process that has been launched will determine the content of the only European instrument that is applied to institutions through their agencies. This article examines the revision: the four elements that a standard contains and which of them can be changed without destabilising the register, the difference between a revision of wording and a revision of scope, the interests that the consultation must reconcile, and the timetable that a three-year revision actually requires. It argues that the decisive question is not what the standards say but what they are asked to cover, and that an expansion of scope beyond the capacity of the agencies will produce formal compliance rather than quality.

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1. An Instrument Applied at a Distance

The European Standards and Guidelines are unusual among European instruments because they are not addressed to institutions but to the agencies that assure them.

An agency that wishes to be listed in the European register must demonstrate that it complies with the standards, and it then applies its own procedures to the institutions in its jurisdiction. The instrument therefore operates at a distance of one step: a change in the standards reaches a university through its agency, and the delay is between one evaluation cycle and two.

The standards reach a lecture hall through an agency, one cycle later

The consequence is that the standards are a document for a professional community rather than for a public, and the community that reads them is small, technical and directly affected by every word. A revision is therefore a negotiation within that community, and the negotiation is the reason that the process is slow and the outcome is incremental.

2. Four Elements of a Standard

Every standard in the document has four elements, and a revision can touch one of them without touching the others.

The first is the requirement: what an agency or an institution must do, stated as an obligation. The second is the explanation: a commentary that states what the requirement means in practice and is consulted in an evaluation. The third is the evidence: the documents and the observations through which compliance is established.

The fourth is the scope: which institutions or activities the requirement covers. A revision of the first element changes what is required, one of the second changes what is understood, one of the third changes what is collected, and one of the fourth changes who is subject to it.

The four have very different consequences. A change of wording in the first element can be absorbed within a cycle; a change of the fourth can require a legislative change in a member state and the creation of a new procedure in every agency.

3. The Register and Its Stability

The European register of quality assurance agencies is the instrument through which the standards have their effect, and its stability is a condition of the revision.

An agency listed in the register is recognised by the other members, and that recognition is what allows a qualification assured by the agency to be treated as comparable. The register operates on a five-year cycle, and a revision of the standards in the middle of a cycle creates a situation in which an agency is evaluated against a version of the document that has changed.

The instrument that manages the transition is a defined application date, a period in which both versions are accepted, and a stated rule about which version applies to an agency whose review falls within the transition. Those three are administrative and they are the reason that a revision takes three years rather than one, and a process that omits them produces a register in which the evidence is inconsistent.

4. Revision of Wording

The largest part of any revision is editorial, and its significance is underestimated by the communities that follow the document.

A standard that has been applied for a decade accumulates interpretations: a phrase that an agency reads one way and a panel another, a requirement that has become a formality, a paragraph that describes a practice which has disappeared. An editorial revision removes the ambiguity and updates the description, and its effect is a reduction of the variation between agencies.

The instrument through which an editorial change is evaluated is a mapping: each revised standard is accompanied by a statement of what changed, why, and what it means for an agency that complied with the previous version. A mapping is a technical document and it is the only thing that allows an agency to prepare, and a revision published without one produces a year of uncertainty.

5. Revision of Scope

The substantial question of the revision is scope, and the candidates for inclusion are known before the consultation begins.

The first candidate is the provision that is not a degree: micro-credentials, short courses, professional certificates, the growing volume of activity that an institution offers and that its quality assurance does not cover. The second is the alliance: a European Universities alliance that awards a joint qualification or delivers a shared programme, and whose provision falls between the jurisdictions of several agencies.

The third is the mode: online and hybrid provision, which the standards address as a matter of delivery and which requires an assurance that examines the design rather than the campus. The fourth is the pathway: recognition of prior learning and of qualifications earned in another system, which is an assurance of an assessment rather than of a programme.

6. The Capacity of the Agencies

An expansion of scope is only credible if the agencies can perform it, and the capacity of the agencies is the constraint that the consultation must confront.

A small agency with four staff and a national mandate cannot develop a methodology for micro-credentials, evaluate an alliance that operates in five jurisdictions and assess online provision, within a cycle. It can adopt a checklist and it will, because a checklist is what an agency does when it has no capacity, and a checklist produces formal compliance.

The instrument that makes an expansion credible is a staged implementation: a standard that is adopted, a guidance that is developed with a pilot, a period in which the standard is applied in a voluntary review, and only then an obligation. A revision that adopts a scope before the methodology exists has produced a document that an agency will satisfy on paper.

Element	What changes	Consequence
Requirement	The obligation	Absorbed in a cycle
Explanation	The interpretation	Guidance must follow
Evidence	What is collected	Agency procedure changes
Scope	Who is covered	Legislation and new methods

Table 1 What a revision can change and its consequence

7. The Interests in the Consultation

A consultation on the standards is a negotiation among four interests, and each has a different preference.

The institutions prefer a standard that is proportionate and that does not duplicate their internal assurance. The agencies prefer a standard that is stable and that does not require a methodology they do not have. The students prefer a standard that gives them a role and that produces information they can use. The ministries prefer a standard that supports a policy they are pursuing and that does not create a cost.

The instrument that reconciles the four is a draft with a stated rationale for each change, published before the consultation, so that a respondent can disagree with a reason rather than with a sentence. A consultation on a text without a rationale produces a list of positions; one on a text with a rationale produces a set of arguments that the drafting group can weigh.



Figure 1 What a revision touches

8. The Student and the Standard

The role of students is the element of the standards that the consultation will test most directly, because the current text requires their participation in a way that is unevenly implemented.

A standard that requires a student member on an evaluation panel is satisfied by an appointment; a standard that requires the panel to con-

sider a student submission is satisfied by a procedure. The difference appears in the report, where a student perspective that is present changes the finding and one that is nominal does not.

The instrument is a requirement stated as an effect rather than as a composition: the report must state what the panel learned from students and how it affected the judgement. A requirement of that kind is harder to satisfy and it is the one that produces the change that the participation was meant to produce.

9. The Timetable of a Revision

A revision of this kind has a timetable that is determined by the ministerial cycle, and the timetable is tighter than the work requires.

The process begins with a drafting group appointed after a conference, continues with a consultation that requires a published draft and a period of response, and concludes with an adoption at the following conference. The interval is three years, and the technical work of drafting, consulting, piloting and translating absorbs most of it.

The instrument that protects the quality of the outcome is a separation between the drafting and the adoption: a text that is technically complete a year before the conference, so that the agencies can prepare and the ministers can be briefed. A text that is agreed in the final weeks before a conference is a text that has been negotiated without a pilot.

10. The Risk of Formal Compliance

The characteristic failure of a quality assurance standard is formal compliance, and an expansion of scope increases the risk.

An institution that must demonstrate a requirement will produce a document that demonstrates it, and the document will be written by the office that is evaluated rather than by the practice that is described. A standard that is expanded without a methodology produces more documents and no more quality, and the cost is borne by the institutions that must write them.

The instrument that limits the risk is a requirement for evidence that the institution did not produce for the purpose: a record of a decision, a minute of a meeting, an assessment that was conducted for a student.

Evidence of that kind is harder to fabricate and it is the only evidence that describes a practice.

11. The Consultation and Its Respondents

The value of a consultation depends on who answers, and the answer rate is a known weakness of the instrument.

An agency answers because it is directly affected; an institution answers if it has a quality office with an interest; a student answers rarely, and a student union answers with a position that is drafted for a different purpose. The result is a consultation in which the professional community is over-represented and the users of the system are under-represented.

The instrument that corrects the imbalance is a targeted consultation with a sample of institutions and student bodies, conducted by interview rather than by questionnaire, and reported separately. The cost is a few weeks and the benefit is a body of evidence that the professional respondents cannot supply.

12. What the Revision Should Not Do

The revision should not attempt to settle a question that the sector has not settled, and there are two such questions.

The first is whether the assurance of an institution should be based on its internal quality culture or on its compliance with a standard. The standards contain both, and the balance is a matter of national tradition that a European document cannot resolve without imposing one.

The second is whether the assurance of a programme should be conducted by an agency or by the institution with an external validation. The two models produce different costs and different relationships, and a standard that prescribes one will be resisted by the systems that have built the other. The revision can require that either model is transparent, and it cannot require that one is adopted.

13. The National Implementation

A European standard is implemented through national procedures, and the revision will succeed or fail in the twenty-odd systems that translate it into a law or a regulation.

A system with a strong agency and a statutory mandate can adopt a revised standard within a year: the agency amends its manual, the ministry amends the regulation, and the next cycle applies the new text. A system in which the standard is embedded in a law requires a legislative amendment, a consultation and a parliamentary timetable, and the process can take three years.

The instrument that manages the difference is a transition provision that states what an agency must demonstrate in the period, and a technical assistance that supports the systems which must legislate. A revision that assumes a uniform capacity to implement has produced a standard that will be applied in some systems and cited in others.

14. The Measure of the Revision

The success of a revision will be judged by whether the agencies that apply it can explain what they do differently, and the measure is a description rather than a number.

The descriptions that matter are three: what a panel now examines that it did not examine before, what an institution now produces that it did not produce before, and what a student now receives that she did not receive before. Each is a change in a practice, and a change in a practice is what a standard is for.

The instrument that produces the descriptions is a review conducted two years after the new text is applied, with a sample of agencies and institutions, and a public report. A revision that is adopted and not reviewed is a document that has been published; a revision that is reviewed is an instrument that has been tested, and the difference is the one that the process has learned to make in twenty years of quality assurance.

15. Conclusions

The revision of the standards is a technical process with a political dimension, and its outcome will be determined by the question of scope

rather than by the wording of the requirements. An expansion of scope is credible only where a methodology and an agency capacity exist.

Three conclusions follow. A mapping of every change, with a statement of what it means for an agency that complied with the previous version, is the instrument that allows the community to prepare and that prevents a year of uncertainty. A staged implementation, in which a new scope is first applied in a voluntary review and only later as an obligation, is what prevents an expansion from producing checklists instead of quality. And a requirement stated as an effect, such as a report that must state what the panel learned from students, is what converts a formal participation into a change in the finding, since a composition requirement is satisfied by an appointment.

References

[1] Nagy, E. (2023). Quality assurance and the European standards. Budapest: Eötvös Loránd University.

[2] European Association for Quality Assurance in Higher Education (2024). Revision of the ESG: consultation document. Brussels.

[3] European Higher Education Area (2024). Tirana Communiqué. Tirana: Ministerial Conference.

[4] Stensaker, B., & Harvey, L. (2011). Accountability in higher education. London: Routledge.

[5] ENQA (2022). The European quality assurance register. Brussels.

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