

THEMATIC ANALYSIS: INDEPENDENCE OF THE QUALITY ASSURANCE AGENCIES



Univerza v Novi Gorici | Foto: CasarsaTinta foto studio

Maja Milas
2022



n.a.k.v.i.s

Nacionalna agencija Republike Slovenije
za kakovost v visokem šolstvu

s.q.a.a

Slovenian Quality Assurance Agency
for Higher Education

INTRODUCTION

The debates about university autonomy and the relationship between the state and higher education institutions have always been topical and generated intense discussions. It is strongly agreed that there are considerable benefits and importance of university autonomy, especially in the context of academic, organisational, financial and staff autonomy.

From a system point of view, it seems difficult to consider the academic freedom and institutional autonomy of higher education institutions without considering the role of quality assurance agencies. In Europe, the Bologna Process, which was launched at the end of the 1990s and paved the way for the establishment of a European Higher Education Area, prompted countries to adopt a governance design for Quality Assurance Agencies (QA agencies) that highlighted their independence (Durán, Jordana, Royo, Juanatey, 2019).

The quality of higher education emerged as an increasingly regulated area, where countries generally shifted away from direct control of centralised institutions but still remained a strong influence. Obligations to establish independent public or private QA agency are inspired by credibility, integrity, professionalism, and trustworthiness considerations. These obligations are important in ensuring that expertise plays a decisive role in the decision-making process for students, teachers, and higher education institutions.

Except for quality, one of the most essential higher education principles is autonomy, which refers to the ability of higher education institutions to decide autonomously on various academic and management issues. In the context of QA assurance agencies, independence and autonomy are also being addressed from different perspectives. The main idea is that procedures and decisions on accreditations and evaluations are based on expertise.

This paper is contextualised to explore the independence of QA agencies from different national backgrounds. The study examines differences and commonalities among QA agencies and provides a methodology to assess their autonomous behaviour at different levels.

Further on, the paper aims to present some examples of different autonomous practices and open discussion to foster the independence of QA agencies.

INDEPENDENCE OF QUALITY ASSURANCE AGENCIES

The role of QA agencies is crucial in supporting higher education institutions to demonstrate quality study programmes for the students and fulfil society's expectations. In this regard, independence is essential in ensuring that expertise plays a decisive role in decision-making and avoids conflict of interest. Obligations to foster independent QA agencies are crucial in ensuring that expertise plays a decisive role in the decision-making process for students, teachers, and higher education institutions.

The study is focused on identifying challenges related to governmental influence on the work of the QA agencies.

Recent decades have seen a considerable increase in delegation to independent regulatory agencies, which has been justified by reference to the superior performance of these bodies relative to government departments (Koop, C., & Hanretty, C. (2018).

With the concept of political independence of an agency, we mean »the degree to which the agency takes day-to-day decisions without the interference of politicians in terms of the offering of inducements or threats and/or the consideration of political preferences« (Hanretty & Koop, 2013, p. 196). On a general level, independence has been normally understood as the capability to decide on matters of responsibility without third party interferences. From the perspective of the QA agencies, independence can be "determined by the scope and the extent of the agency's decision-making competencies" (Jordana, 1994).

Regulation by independent agencies rather than ministries is believed to result in better policy outcomes. Yet this belief requires one to accept a complex causal chain leading from formal independence to actual independence from politics, policy decisions, and, ultimately, policy outcomes. Political interference occurs when the political leader(s) interfere with decision-making in public administrative matters such as planning, organizing, staffing, directing, coordinating, reporting, budgeting, and allocation and use of public funds.

Essential for public agencies is their independence, relative independence from the founder. Reasons for independence can vary, such as the need to involve different governance actors in the administrative process, ensuring greater interest, legitimacy and decision-making and involvement of various civil society organizations in the administrative process. Independence also implies relative independence of governance from daily politics, ensuring independence from the activities of the government and the administration and ensuring professionalism in decision-making in a particular field, as a larger number of experts can be involved in a non-governmental organization.

In a broader sense, organisational or political culture has been the subject of continued discussion and extensive research over the past half-century. The organisational culture has been widely discussed in the context of leadership style, decision-making modes, standards of performance, evaluation strategies, perception of students, organisational unit, goal definition, and source of authority. Institutional integrity requires a commitment to values that prioritise the protection of basic democratic principles over temptations of pragmatic decision making.

This study has moved beyond the research of independence by possible influence by external influence. We have been able to take this step thanks to the use study of the An Independence Index of Quality Assurance Agencies in Higher Education: European and

Latin American countries compared and University Autonomy in Europe by EUA¹. In our study, we focus on political independence. This does not imply that independence from other actors is unimportant, and however, we identified the political influence as most prevailing in the work of the QA agencies.

To encourage debates and activities among QA agencies to foster the independence of QA agencies, at Slovenian Quality Assurance Agency (SQAA) with the collaboration of the Central and Eastern European Network of Quality Assurance Agencies in Higher Education (CEENQA) we started to develop an approach for analysing the independence of quality assurance agencies in five main areas, namely the appointment of chief executive, the process of preparing the quality standards, the appointment of experts, the decision-making procedures and the appeal procedures.

INTERNATIONAL AND EUROPEAN CONTEXT

When it comes to the debate on the European level, the principle of independence has been widespread and promoted as one of the agencies' recognized quality standards.

The Standards and guidelines for quality assurance in the European Higher Education Area (ESG) provide the framework for internal and external quality assurance. Implementing quality assurance in line with the ESG is one of the key commitments of the Bologna Process. The ESG provides the basis for enhancing trust, mobility, and recognition between higher education systems. They were adopted at the EHEA Ministerial Conference in 2015. (ENQA, ESG).²

According to the ESG, a QA agency must be able to demonstrate that its operational independence from higher education institutions and governments is guaranteed in the official documentation. ESG states that agencies should have full responsibility for their operations and the outcomes of those operations without third party influence.

Considering the independence of agencies according to the 3.3 standards of the ESG, the following types of independence are essential:

- *Organisational independence*: demonstrated by official documentation (e.g., instruments of government, legislative acts or statutes of the organisation) that stipulates the independence of the agency's work from third parties, such as higher education institutions, governments and other stakeholder organisations;

- *Operational independence*: the definition and operation of the agency's procedures and methods, as well as the nomination and appointment of external experts, are undertaken independently from third parties such as higher education institutions, governments and other stakeholders;

- *Independence of formal outcomes*: while experts from relevant stakeholder backgrounds, particularly students, take part in quality assurance processes, the final outcomes of the quality assurance processes remain the responsibility of the agency.

¹ *An Independence Index of Quality Assurance Agencies in Higher Education*: <https://eua.eu/resources/publications/905:an-independence-index-of-quality-assurance-agencies-in-higher-education-european-and-latin-american-countries-compared.html>

EUA, *University Autonomy in Europe*: <https://www.university-autonomy.eu/>

² ENQA, ESG: <https://www.enqa.eu/esg-standards-and-guidelines-for-quality-assurance-in-the-european-higher-education-area/>

Anyone contributing to external quality assurance activities of an agency (e.g., as an expert) is informed that while a third party may nominate them, they are acting in a personal capacity and not representing their constituent organisations when working for the agency. Independence is important to ensure that any procedures and decisions are solely based on expertise.

Outside Europe, we know little about the institutional and organizational characteristics of these entities in other regions. Positively, at a global level, the 2016 revised edition of the INQAAHE Guidelines of Good Practice includes a statement regarding the recommended governance: »the composition of the decision-making body and its regulatory framework ensures its independence and impartiality« (INQAAHE 2016).

METHODOLOGY FOR ANALYSING INDEPENDENCE OF QUALITY ASSURANCE AGENCIES

Within our research activities, we developed a methodology for analysing the independence of QA agencies. We wanted to understand the role of the QA agencies in different national environments, explore key aspects of their independence, and compare the autonomous responsibilities in different processes at the agencies level.

The proposed methodological approach aims to form an information space for simultaneous comparison and assessment of the level of independence of QAAs, and provide indicators that affect it.

The focus of our research relies on the five main categories of independence:

1. The appointment of chief executive of the quality assurance agency,
2. The process of preparing and adopting criteria / standards for accreditation and evaluation procedures,
3. The appointment of experts for accreditation and evaluation procedures,
4. The decision-making procedures on the accreditation and evaluation procedures and
5. The appeal procedures for the accreditation and evaluation procedures.

Figure 1: Questionnaires for the QA agencies

The appointment of chief executive	The process of preparing and adopting criteria	The appointment of experts	The decision-making procedures	The appeal procedures
Who appoints the chief executive of the agency ? What kind of procedure is implemented (call for tender, internal tender, etc.)? What is the constitution of the body (council, board, etc.) that appoints the chief executive of the agency (<i>if applicable</i>)? Who in this appoints and confirms the members of the	Does the agency autonomously adapt and decide on the criteria for accreditation and evaluation procedures? If not, what kind of procedures are applied? Who prepares and/or adopts the criteria/quality assurance standards for accreditation and	Who appoints the experts in the decision-making processes? How are experts selected? What is the constitution of the body (council, board, etc.) that nominates the experts in accreditation and evaluation procedures (<i>if applicable</i>)?	Who decides on accreditation and evaluation procedures ? What is the constitution of the decision-making body which decides on accreditation and evaluation procedures (<i>if applicable</i>)? Who, in this case, nominates and confirms the members of the	What kind of appeal procedures are possible against the decisions in accreditation and evaluation procedures? Who appoints the members of the Appeal Committee ? What kinds of decisions does the Appeal Committee adopt (e.g. can it change the decisions of the

<p>body? What kind of procedure is applied in case of external confirmation (e.g., ministry)?</p> <p>What is the selection process of the chief executive of the agency? What are the criteria for selecting the chief executive? What is the term of office of the chief executive?</p> <p>What is the dismissal process of the chief executive of the agency?</p> <p>What are the competencies /responsibilities of the chief executive?</p> <p>What is the accountability of the chief executive?</p>	<p>evaluation procedures?</p> <p>What is the constitution of the body (council, board, etc.) that prepares criteria for accreditation and evaluation procedures (if applicable)?</p> <p>Who, in this case, nominates and confirms the members of the body? What kind of procedure is applied in case of external confirmation (e.g., ministry)?</p> <p>Does the agency follow an autonomous legal act, or qualitative assurance is a part of a general higher education legal act?</p> <p>Does the agency follow general administrative act (Procedure wise – evaluation, accreditation), or does the agency determine its own procedures autonomously?</p>	<p>Who in this case appoints and confirms the members of the body? What kind of procedure is applied in the case of external confirmation (e.g. ministry)?</p>	<p>body? What kind of procedure is applied in the case of external confirmation (e.g. ministry)?</p> <p>What are the criteria for selecting board members? Who nominates the president of the Board? What is the term of office of board members?</p> <p>What kinds of decisions does the decision-making body/chief executive adopt (recommendations, final decisions, etc.)? What kind of procedure is applied in case of external confirmation (e.g., ministry)?</p>	<p>decision-making body, return the decisions to the decision-making body, etc.)?</p> <p>What is the constitution of the body (council, board, etc.) that nominates the members of the Appeal Committee (<i>if applicable</i>)?</p>
---	---	---	--	--

As a method of collecting information about the independence of the QA agencies, we use open-ended questionnaires based on these five main quality indicators. In the process of collecting data, we determined the scale for each criterion - 1 being the most independent, which means that government does not have a dominant influence and 4 being the least independent, meaning that government has a dominant influence on the functioning of the quality assurance.

We complemented the outcomes of the survey from the open-ended questionnaires with the findings of the examination of the other relevant documents, such as regulations on accreditations and evaluations and self-evaluation reports of QA agencies. In the research process, we also analysed ENQA reports. Specifically, we analysed the 3.3 standard of the ESG, which refers to the independence of quality assurance agencies. In addition, we

also took a look at the general status of the QA agency, connected to legal status, organisation and background.

Figure 2: The rating scale

Rating scale	Level of independence	Governmental/political influence on the functioning of the QA agencies		%
Compliant	Independent	Government has a strong influence on the work of the QA agency	1	100
Substantially Compliant	Mostly independent	Government has certain influence on the work of the QA agency	2	66
Partially Compliant	Partially independent	Government has a strong, indirectly dominant influence on the work of the QA agency	3	33
Non-compliant	Dependant	Government has a strong and predominant influence on the work of the QA agency	4	0

FINDINGS OF THE SURVEY

Quantitative analysis

Until now, we have qualitatively and quantitatively analysed the questionnaires of 28 QA agencies. 22 out of 28, which were included in the sample, are CEENQA members. 14 out of 28 agencies are members of ENQA, and 14 out of 28 agencies are not its members. In quantitative terms, the total average or independence indicator for all agencies included in the analysis is 60, 7. More precisely, the overall independence indicator of non-ENQA members is 48, 7 while the independence indicator for ENQA members is a total of 72, 4. The average for CEENQA members is 57, 6.

The analysis revealed that non ENQA members, due to different political, social and historical reasons, are less independent and autonomous than agencies that are ENQA members. The results further suggest that the effect of ENQA membership is positive, and there are direct correlations between the higher independence indicators and ENQA membership. Within the ENQA members included in the sample, we further analysed and compared our scores with the findings of the ENQA panel. The average or independence indicator deducted from ENQA reports was 92, 7 which is slightly higher than the result of our analysis, which is 76, 7. This suggests we used a more sensitive method in determining the independence indicators for possible governmental influence.

In the sample of QA agencies, there were also 6 private agencies, which overall have a very positive overall independence indicator 94, 3. Based on quantitative results and feedback from interviews, we found that private agencies face minimal political pressures on the QA agencies' work compared to public agencies.

These values were interpreted by considering the five above-mentioned aspects of independence. It has to be noted that in these calculations' financial autonomy and resources of the QA agencies were not included. As opposed to some other authors exploring independence, in this paper, we do not further examine specifics of the two other important areas of independence social accountability dimension and range responsibilities performed by QA agencies.

Figure 3: Independence indicators among all included agencies (Altogether, 28 agencies, 22 of them CEENQA member)

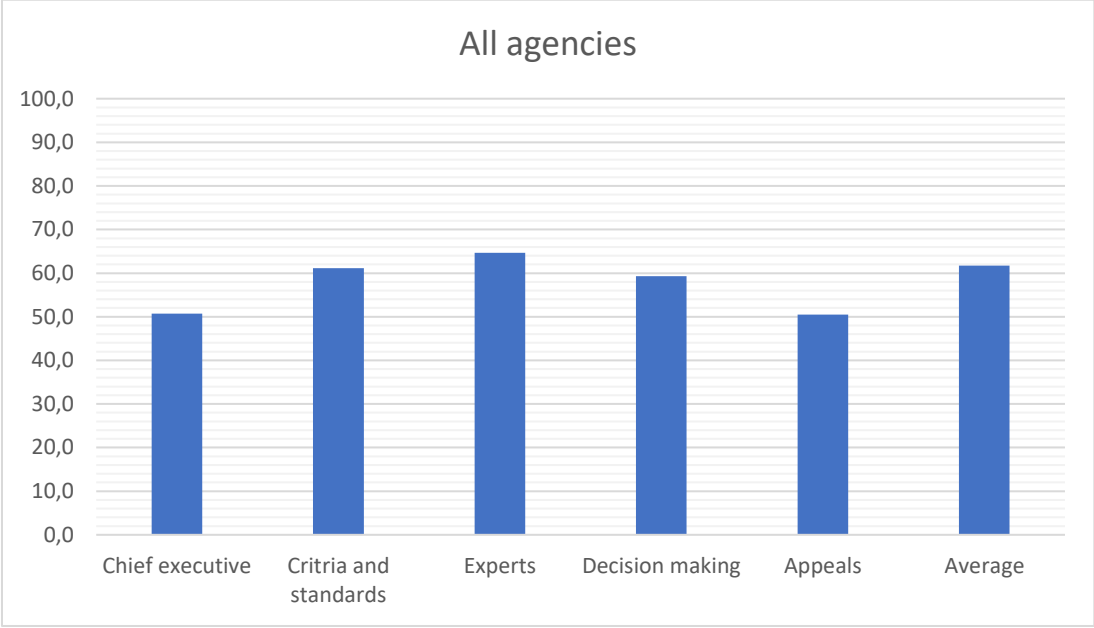
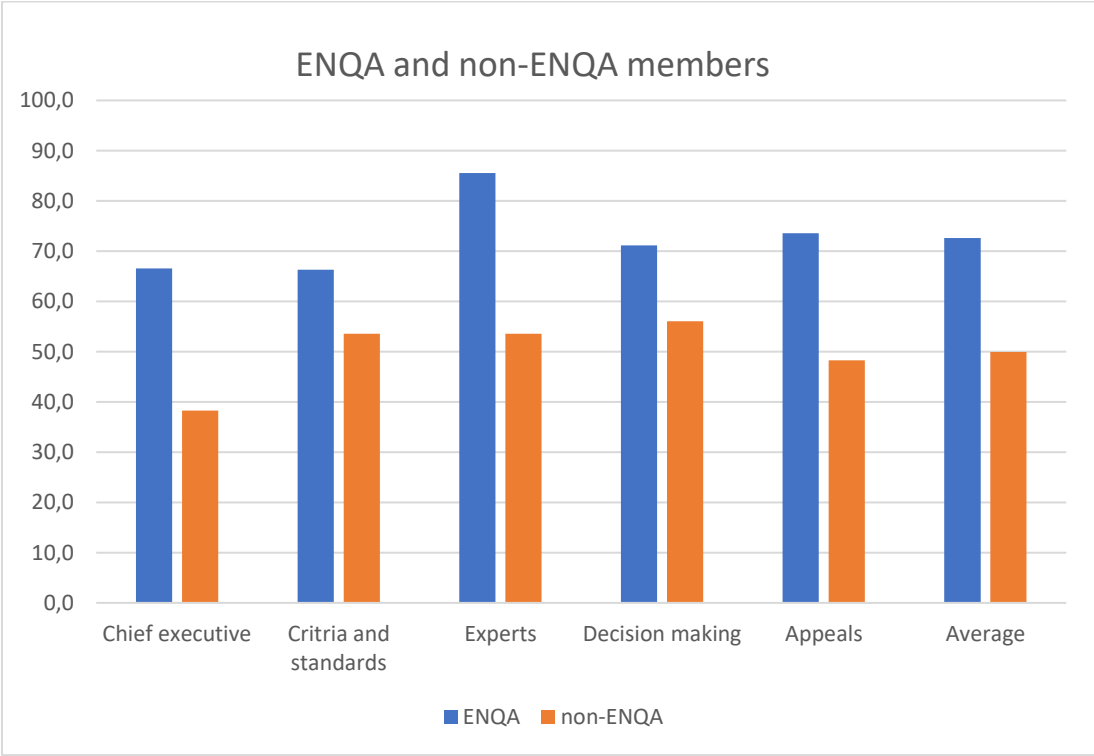


Figure 4: Comparison between ENQA (14) and non-ENQA members (14)



Qualitative analysis

In qualitative terms, the analysis of each of the five categories showed that on a general level, QA agencies have mostly established formal mechanisms to safeguard operations and outcomes of those operations without political influences. The analysis also showed that the influences from ministries or other political entities have diminished and that agencies have strengthened their operational and organisational capacities in the last years.

The study showed that there is a great diversity among QA agencies. Some QA agencies have their foundation laid down by law in an act or decree. Some QA agencies have a decentralised structure, independent from their governments, some QA agencies act as accreditation bodies between the government, and some QA agencies are independent evaluation bodies. QA agencies are established by law, and their organisational independence results directly from the wording in these acts and decrees. Some QA agencies or evaluation bodies have to relate to other legal frame-works, which may influence their independence in other ways.

The analysis indicates that QA agencies usually own their offices and infrastructure and run their premises and logistics independent of the ministry or other state authorities. However, there were some examples where the agency is located within the ministry's offices, and its staff are formally employees of the ministry. The agency also uses the support infrastructure of the ministry, such as IT services, human resource management, payroll and financial management services.

The most dependent situations are where the government directly appoints the chief and the deputy chief. Accordingly, the government can also dismiss the chief executive without a serious reason. The chief executive is accountable to the government. Other examples include situations where the chief executive prepares criteria and the quality assurance standards for accreditation and evaluation procedures. The chief executive is, however, appointed by the government. In the appeal procedures, institutions can't appeal any formal decisions made by the agency, which hinders the credibility and transparency of the QA agency.

Further on, the analysis displayed there is still a great deal of indirect governmental influence on the work of quality assurance agencies. The agencies pointed out that the biggest threat to independence comes from ministries and other political entities. The analysis results exhibit that the autonomy of agencies is most impaired in decision-making procedures and the process of nomination of the agency's chief executive.

In the process of nomination of the chief executive, the governmental influence is manifested mainly through the direct governmental appointment of the chief executive or the indirect appointment of the chief executive by the collective body. For example, the government nominates the majority (5 out of 9 board members) of board members, who appoint a chief executive.

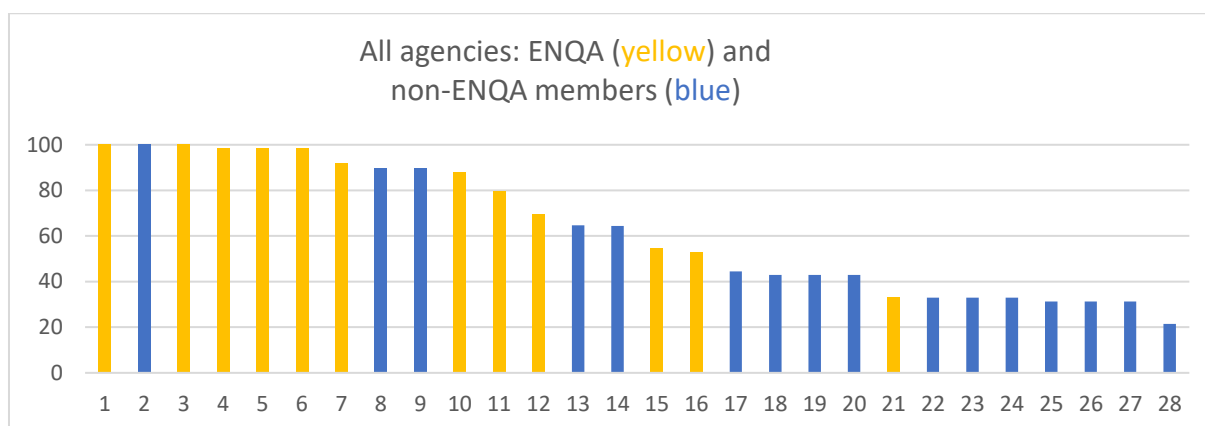
The similar indirect governmental influence connected to the constitution of the collective body is also seen in the procedure of appointing experts, appeal committee members or in decision-making procedures, where governmental board members have a predominant role. In one case, the ministry prepares the register of potential experts, and the agency selects the experts from the register, which is considered partially independent. In the decision-making process, the level of autonomy is further demonstrated by the decision-making power, particularly whether the agency has the final call for an appointment (i.e., the agency's competence to make final decisions in comparison to adopt recommendations merely).

The impact from the government can be further seen by the possibilities of external influence on the procedures, for example, by initiating an extraordinary evaluation or granting licenses/accreditation for higher vocational colleges even though the quality has been assessed negatively by agencies. In appeal procedures, political influence can be visible mainly by the power to ignore the agencies unfavourable accreditation decisions or unclear rules of appeal procedures in so-called grey areas, which leaves room for possible influences. Alongside, the composition of the appeal committee (2 out of 3 members are appointed by the government) in some agencies suggests there is a strong indirect governmental influence or even worse direct influence, where the government establishes the second-instance body.

The most positive and independent situations are where the board of directors nominates the chief executive, where none of the stakeholders has a predominant role. The QA agency follows autonomous legal act – the QA agency independently defines the law on Quality Assurance in Higher Education and standards and criteria for its own quality label. These criteria are rooted in the ESG and are developed in cooperation with different member organisations and committees. The representatives of the interviews confirmed examples of good governing where an agency decides independently on the implementation of the evaluations, the methods used, the members of the evaluation teams, timetables, content of reports and other decisions pertaining to higher education evaluations. Some agencies also acknowledge that the composition of the body, deciding on the accreditation and evaluation procedures, is balanced as to gender and regional and official languages. In the process of appointment experts for the accreditation and evaluations, the selection of experts and evaluation committees is conducted according to public requirements and the criteria set out in agencies statutes and published on its website. There are also positive examples where an agency has a non-conflict-of-interest policy, whereby no person with a personal interest in the matter can have any role in the conduct of its evaluation or making decisions about it.

Based on the interviews, we found out that the influence of ESG among CEENQA members is spreading, and ESGs are gaining acceptance as a shared reference point for all actors in European higher education. Interviewees believe that membership in ENQA has a positive impact on strengthening the agency's independence. They highlighted, that certain quality standards of independence must be established prior to becoming a full member of ENQA. Individual activities related to operational and organizational independence are monitored and also evaluated by a group of ENQA experts as a part of external evaluation procedures. The quantitative results of the survey confirm that the effect of ENQA membership is positive, and there are direct correlations between the higher independence indicators and ENQA membership.

Figure 5: Average values of agencies, included in the survey



Examples

In the following table, we listed examples of more and less independent situations at the level of QA agencies.

Rating scale		Governmental/political influence on the functioning of the QA agencies		%
Compliant	Independent	Government does not have strong influence	1	100
	<i>Examples</i>	<ul style="list-style-type: none"> ✓ The chief executive is nominated by the board of directors, where none of the stakeholders has a predominant role (Ex. 2 out of 9 board members are nominated by the government). ✓ The higher education legislation defines the status of the agency as an independent and non-profit making organisation and also specifies its managerial structure. ✓ The self-assessment report draws a distinction between the organisational independence of the agency, defined in legal terms, and operational independence that refers to the conduct and management of accreditation procedures. ✓ The financial independence from ministry is guaranteed by a separate sub-item in the state budget, which the agency can independently decide how to use. ✓ Agency's Code of Ethics guarantees that QA procedures are carried out respecting impartiality, objectivity, integrity and confidentiality etc. In order to observe this, agency has installed (auxiliary unit) an Ethics Committee. ✓ The function of the director is incompatible with that of a Member of Parliament, Senator, Member of the Government, Judge, Public Prosecutor, or Member of the Supreme Audit Office. Furthermore, it is also incompatible with the position of Rector, Vice-Rector, Dean, Vice-Dean, Director of a HEI, member of the Academic Senate of a HEI or faculty, Bursar, or Secretary of the Faculty, as well as the corresponding functions at a private HEI. ✓ The Agency follows autonomous legal act – Law on Quality Assurance in Higher Education. 		

		<ul style="list-style-type: none"> ✓ Standards and criteria are independently defined by the agency for its own quality label. These criteria are rooted in the ESG and are developed in cooperation with different member organisations and committees. ✓ Agency decides independently on the implementation of the evaluations, the methods used, the members of the evaluation teams, timetables, content of reports and other decisions pertaining to higher education evaluations. Other interested parties (such as higher education institutions, ministries and stakeholders) have no effect on the agencies decisions or evaluation results. ✓ The composition of the body, deciding on the accreditation and evaluation procedures, is balanced as to gender and regional and official languages. ✓ The selection of experts and evaluation committees is conducted according to public requirements and the criteria set out in agencies statues, and published on its website. ✓ The independence of the agency decisions is reinforced by the emphasis on the policy that board members are not representatives of their employers (e.g., the HEIs or the unions) but represent the whole field of higher education as independent experts. ✓ Agency has a non-conflict-of-interest policy, whereby no person with a personal interest in the matter can have any role in the conduct of its evaluation or making decisions about it. ✓ The reports of the agency are public documents but not directed to or accountable to the ministry. The council may initiate evaluations at the suggestion of institutions or at the request of the ministry, but the conduct of evaluations is managed separately and independently. ✓ The criteria of the agency are rooted in the ESG and are developed in cooperation with member organizations and different field specific committees. ✓ Stakeholders feel deeply involved in the agency's quality assurance activities. The overall idea among the stakeholders seems to be that if anyone has a complaint, they would be able to approach someone within agency about it. ✓ Agency conducts its staff recruitment independently, utilising a recruitment database for governmental organisations. All positions longer than 6 months must be filled by open call. 		
Substantially Compliant	Mostly independent	Government has minor influence.	2	66
	<i>Examples</i>	<ul style="list-style-type: none"> ✓ The chief executive is nominated by the board of directors, where none of the stakeholders has a predominant role (Ex. 4 out of 9 board members are nominated by the government). ✓ The government gives a broad instruction of what task agency has to undertake without intervening in the organisational and operational process of the agency. ✓ Certain provisions on the chief executive's power of decision are issued by government decree. ✓ The agency independently prepares criteria for accreditations and/or evaluation procedures abroad, but not also accreditation procedures on the national level. 		

		<ul style="list-style-type: none"> ✓ The experts in evaluation procedures are mainly national experts, which lessen the public perception of the agency's independence. ✓ Higher education institutions have a possibility to comment on the appropriateness of the suggested experts from the point of view of conflict of interest. Sometimes it happens that Higher education institutions reject experts nominated by the agency but they have to give reasons for rejection. ✓ The register of potential experts is prepared by the ministry, the agency selects the experts from the register. ✓ Although the agency has no fixed written understanding of consultation, it is aware of the thin line between feedback from an expert and prohibited consultation as part of an accreditation procedure. 		
Partially Compliant	Partially independent	Government has a strong, indirectly predominant influence	3	33
	<i>Examples</i>	<ul style="list-style-type: none"> ✓ The chief executive is nominated by the board of directors, where one of the stakeholders has a predominant role (Ex. 5 out of 9 board members are nominated by the government). ✓ The agency is located within the offices of the ministry, and its staff are formally employees of the ministry; it uses the support infrastructure of the ministry, such as IT services, human resource management, payroll and financial management services. ✓ The chief executive of the agency works only contractually as it's still employed as a full-time professor at the University. ✓ Ministry and the representative bodies of higher education institutions propose and negotiate about possible candidates for the chief executive. ✓ Provisions on the chief executive's power of decision are issued by government decree. ✓ Agency is expected to do additional government assignments every year (such as thematic analysis). ✓ The rules on procedure, composition of the decision-making body and other principles are determined by the accreditation regulation approved by the order of the Minister of education. ✓ The agency's by-laws are approved by decree by the Regional Government on the recommendation of the person in charge of the department responsible for universities. ✓ The rules on procedures, a composition of the decision-making body and other principles are determined by the accreditation regulation approved by order of the ministry. ✓ The final composition of the expert panel and the dates of the site visit are approved by the director of the agency. ✓ On the basis of the re-accreditation procedure conducted and the opinion of the accreditation council, the agency provides an accreditation recommendation to the minister to: Issue a confirmation on the fulfilment of conditions for performing higher education and/or scientific activities, or parts of activities; deny the license for performing higher education and/or scientific activities, or parts of 		

		<p>activities; issue a letter of expectation with the deadline for resolving deficiencies of up to three years.</p> <ul style="list-style-type: none"> ✓ Minister in charge for science and higher educations, rectors or deans of HEI's can suggest the extraordinary accreditation and evaluation procedures. ✓ Complaints are submitted to the director during the procedure, and appeals on formal decisions need to be submitted to a second- instance body. ✓ There is no clear distinctions between the complaint and the appeal procedures. 		
Non-compliant	Dependent	Government has a strong and predominant influence	4	0
	<i>Examples</i>	<ul style="list-style-type: none"> ✓ The government directly appoints the chief and the and deputy chief. ✓ Provisions on the operating principles, staff, qualification requirements, councils and remuneration are issued by government decree. ✓ The government can dismiss the chief executive without a serious reason. ✓ The chief executive is accountable to the Government. ✓ The procedure of nomination the chief executive is conducted by the ministry. ✓ The chief executive of the agency is be appointed and dismissed by the regional governmental council. ✓ The criteria and the quality assurance standards for accreditation and evaluation procedures are prepared by the chief executive, who is appointed by the government. ✓ The criteria required for formulating evaluation plans are issued by government decree. ✓ Institutions can't appeal any formal decisions made by the agency. ✓ Although there is provision to allow institutions to raise objections to the draft report, the agency does have a published complaints and appeals process that allows concerns to be independently assessed by competent individuals not involved in the external review process. 		

CONCLUSIONS

The analysis highlights that agencies' dependence depends on the specific context in which they operate and the legal requirements placed on agencies.

In short, the QA agencies' independence is significant as the higher levels of political independence are associated with a higher quality of work. Our finding suggests that there are good reasons to justify political independence by reference to better work of the QA agencies. More independent institutions tend to do better quality work than institutions that are less independent. The survey results further suggest that the effect of ENQA membership is comparable in magnitude with the effect of an increase in independence indicators.

The analysis shows there are critical areas in fostering the independence of QA agencies. The results of our analysis point to the problems concerning the political sphere of independence, especially for public agencies. It emphasises the need to develop an appropriate political and organisational culture and unify methods to safeguard the independence of agencies from political and national interests, taking account of and accommodating the diversity of agency.

We believe further work is needed to identify common problems, exchange examples of good practices and propose relevant solutions. The results of the proposed methodological approach represent a baseline to determine the relationship between formal and actual independence of QA agencies. The findings of our survey highlighted the need to foster further the organisations' operational autonomy and autonomy of formal outcomes.

Well-performing quality assurance agencies will equalise quality standards and constitute activities to fully support higher education systems and consequently fulfil the expectations of teachers and students in an increasingly diversified European environment.

LITERATURE

About political culture: Kavanagh, D. (1972). Political culture. Macmillan International Higher Education.

Bologna Declaration (1999),
http://www.ehea.info/media.ehea.info/file/Ministerial_conferences/02/8/1999_Bologna_Declaration_English_553028.pdf.

European University Association (EUA), University Autonomy in Europe:
<https://www.university-autonomy.eu/>.

Koop, C., & Hanretty, C. (2018). Political independence, accountability, and the quality of regulatory decision-making. *Comparative Political Studies*, 51(1), 38-75.

Jordana, J., Fernández-i-Marín, X., & Bianculli, A. C. (2018). Agency proliferation and the globalization of the regulatory state: Introducing a data set on the institutional features of regulatory agencies. *Regulation & Governance*, 12(4), 524-540.

Jacint Jordana (Universitat Pompeu Fabra and IBEI), Ana García Juanatey (CEI International Affairs and Universitat Pompeu Fabra), Ixchel Pérez Durán (UAB), David Sancho Royo (Universitat Pompeu Fabra), An Independence Index of Quality Assurance Agencies in Higher Education: European and Latin American countries compared, EQAF paper (2021), <https://eua.eu/resources/publications/905:an-independence-index-of-quality-assurance-agencies-in-higher-education-european-and-latin-american-countries-compared.html>.

Juanatey, A. G., Jordana, J., Durán, I. P., & Royo, D. S. (2021). Independence, accountability and responsibilities of quality assurance agencies in higher education: European and Latin American countries compared. *European Journal of Higher Education*, 11(2), 175-196.

Moynihan, R., Bero, L., Hill, S., Johansson, M., Lexchin, J., Macdonald, H., ... & Godlee, F. (2019). Pathways to independence: towards producing and using trustworthy evidence. *Bmj*, 367.

Rayevnyeva, O. V., Aksonova, I. V., & Ostapenko, V. M. (2018). Assessment of institutional autonomy of higher education institutions: methodical approach.

Núria Cometseñal, Sandra Marcos Ortega, Oleespen Rakkestad, Maiki Udam, Elsvan Zele, Analysis of the European standards and guidelines (ESG) in external review reports: system-wide analysis, resources, and independence (2015), *Workshop report 23*, <http://www.enqa.eu/index.php/publications/papers-reports/workshop-and-seminar-reports>.

Seyfried, M., & Pohlenz, P. (2018). Assessing quality assurance in higher education: quality managers' perceptions of effectiveness. *European Journal of Higher Education*, 8(3), 258-271.

Standards and Guidelines for Quality Assurance in the European Higher Education Area, Publication: 19/08/2016, <http://ehea.info/pid34433/quality-assurance.html>.