Accreditation and the British Experience

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Introduction

The origins of this conference go back nearly ten years to a seminar in this building in 1992, when I was invited by the Ministry of Science and Research (BMWF) to present a paper about the Council for National Academic Awards (CNAA) in Britain. This was the body that validated the academic programmes and accredited institutions in the non-university sector in the United Kingdom, mainly the polytechnics. The seminar was organised by the Ministry to discuss future policy for a non-university sector of Fachhochschulen in Austria. It was a strange experience for me, for the British government had just decided to abolish the CNAA and to allow the polytechnics and some other major colleges to become universities. I found myself advocating an ‘accreditation model’ in higher education that we had just decided to get rid of.

Many things have changed in the ten years or so since then. The government of Austria was not deterred by the demise of the CNAA and went on to create a new Fachhochschul sector, and a new accreditation body for its courses, the Fachhochschulrat. You will hear later from my colleagues Hans Pechar and Thomas Pfeffer about the outcomes of these policies. In the UK, the polytechnics became universities, and a new, national, quality assurance body was set up, covering the whole university sector.

The establishment of an accreditation model for the Fachhochschul sector was a significant change in Austria, with its long tradition of state regulation and control in higher education (and
in many other areas of policy). The Fachhochschul policy broke with this long tradition, creating an independent and expert body which itself made decisions. And the idea of the Fachhochschulrat was based on the experience of the CNAA in Britain. Perhaps, after all, my seminar paper in 1992 was more convincing than it seemed at the time!

There have been significant changes on a wider scale, too, throughout Europe. The Bologna Declaration has set out intentions to create a European higher education area with a common qualification framework. There are many reasons why this has happened and we will be hearing more about them from other contributors today.

For now, we can note a number of problems. Higher education systems across Europe are diverse, and public knowledge about institutions and their courses is often confused, not only between the systems in different countries but sometimes even within the same country. There are, too, multiple providers in many countries, not just state-established, traditional colleges and universities, but also a variety of what OECD (1991) calls ‘third sector’ higher education, some of it in the profit-making sector.

To diversity of provision is added diversity of quality assurance and other arrangements in different countries for control of institutions and their courses. This has caused problems for student mobility and credit transfer within Europe, one of the concerns of the Ministers who made the Bologna Declaration. The CRE has set up a project to investigate new mechanisms for accreditation in Europe, about which we will hear more later today.

In this context, comparative studies of the different approaches to accreditation are particularly valuable. In the sessions that follow, we will hear about several different models in different European countries. The developments in Austria are particularly interesting, because they involved one country explicitly drawing on the experience of another to address problems of accreditation in higher education. In the Austrian Fachhochschul policy, we have a fascinating example of what has come to be called ‘policy transfer’.
Policy transfer

The idea of policy transfer is of increasing interest and importance in an increasingly 'globalised' world. With increasing competition in the global economy, and the growing importance of supra-national bodies like the European Union, governments are willing and sometimes eager to learn lessons from each other. Different countries have, of course, always looked at each other's policies and tried to learn from them, but the topics of policy transfer and lesson drawing have emerged as subjects of study in their own right only in the last decade (Dolowitz and Marsh 1996).

One result of this growing interest is a programme of research funded by the British Economic and Social Research Council into Future Governance, which explicitly looks at lessons from comparative public policy. The research that my colleagues Hans and Thomas and I have undertaken on the Fachhochschulen in Austria is part of this programme of research. The Director of this programme, Professor Ed Page will be talking about it later today.

One of the concerns of the programme is to go beyond simply explaining why things happen, to see what positive lessons can be learnt. It is in this spirit that we have organised this conference today. One aim is to explore the extent to which countries have learned and can learn from each other in the development of policy for accreditation in higher education.

For it is clear that there are different patterns of accreditation and quality assurance in higher education. In much of continental Europe we have a 'Humboldtian' model, with universities established, protected and to varying extents controlled by the state. The state also controls and thus guarantees the academic qualifications of the institution. The Austrian system typifies this. At the other extreme, there is the 'Anglo-Saxon' model, of independent institutions, with little or no state control of qualifications, though reliance on state funding means that there is de facto control of the system and institutional development. The universities of the USA and the UK typify this model.

Most countries also have a substantial sector of non-university institutions. Many of these emerged as a significant element in higher education policy in or after the 1960s (OECD 1973, 1991), in response to growing concerns about the relevance of traditional university
education, to the need for vocational and professional higher education, for social mobility through education and for economies in the costs of higher education. The institutions in this sector were much more likely to be directly owned and controlled by the state or public authorities. The polytechnics in the UK and the Fachhochschulen in Germany are examples of these. Austria was unusual in that its Fachhochschulen were established very much later than the corresponding institutions in most other European countries.

A key issue for national governments, as well as for the institutions, their students and their customers, was how to give a recognised currency to the qualifications of these non-university institutions. The different solutions that emerged reflect the different philosophies and models of higher education. There was often a reluctance of universities and governments to allow the institutions to be academically autonomous; many did not permit them to award degrees. The policy issue was to find ways of offering institutions freedom to develop courses and curricula appropriate to their circumstances and to the needs of their students and customers, yet having national, or even international, validity. Thus emerged the idea of accreditation, in which courses and qualifications are accredited by some other supra-institutional body. In some countries, the universities acted as the accreditation agency, in others, it was the state, and in others, it was an independent body. In Britain, as later in Austria, it was this last approach that was adopted.

The British model

The British model was an unusually interesting one. In Britain, the ‘binary’ policy of 1965 set up two separate and distinctive sectors, based on the universities, and on the leading technical and other public sector colleges. 30 polytechnics, formed from existing technical and other colleges, were designated as the leading institutions of the non-university sector. This sector had quite different traditions and administrative arrangements from the universities. The polytechnics were not legal entities, and were administered by the local authorities that maintained schools.

Unlike many other countries, Britain had a long tradition of higher education provision in these colleges, particularly for adults who had been denied or had missed the opportunity earlier.
However, colleges had to rely on the academic authority of other bodies (see below) to offer these higher education courses. Thus, although some colleges offered degrees, they simply administered the courses, mainly of the University of London. They were dependent on and subordinate to the university, and their staff had no part in designing, planning or examining the courses.

By contrast, the polytechnics were able to offer degree courses they had designed and managed themselves, under the authority of a new validating body, the Council for National Academic Awards.

The CNAA

CNAA's function was to grant awards to students who had completed courses of study or research programmes approved by the Council and to approve and validate courses in non-university institutions. It was an independent body its functions defined by a Royal Charter. Courses and qualifications had to be comparable in standard with those in universities. The British binary policy was unique in that it permitted non-university institutions to offer studies up to doctoral level.

The CNAA was established in 1964, before, in fact, the binary policy was proposed. It had originally been thought of as a relatively small-scale device to enable technical and other colleges to develop degree courses and gradually turn into universities. When the binary policy was introduced, CNAA was conveniently already available to accredit the new sector's courses and qualifications.

This accreditation agency, promoting course development and assuring quality in the non-university sector in Britain was central to the success of the binary and polytechnic policies. The growth of CNAA degree work was one of the remarkable achievements of the ensuing years. Fewer than 5,000 students were enrolled on CNAA degree courses in 1965; by 1990 there were over 250,000 such students (CNAA 1970, 1991). The range of courses offered was significantly different from that of the university sector. Among these were courses which brought graduate status to a wide range of vocational and professional fields. Examples
included librarianship, the para-medical professions, urban studies and the visual and performing arts. Business studies became one of the early and biggest growth areas in the non-university sector. The polytechnics soon became identified with the development of modular degree courses, allowing a wide range of combinations of subjects, sometimes within broad areas (such as science), or in more multidisciplinary combinations.

These were significant educational developments. Within a decade of the establishment of the polytechnics, Scott was able to write that their courses provided 'not only an absolute academic gain, but an important expansion of our idea of the scope of higher education' (Scott 1981). It became possible to talk of 'new maps of learning' in the polytechnics (Pratt 1997).

**The functions of the CNAA**
The Council itself consisted of a Chairman and twenty five members appointed by the Secretaries of State for Education and for Scotland, with co-optees and ex-officio members. The appointed members represented the major stakeholders with: seven from the universities; ten from the non-university sector; six from industry and commerce, and two from local authorities. By contrast with the Fachhochschulrat in Austria, the work of the Council was undertaken through committees, of which there were initially nine, and a range of boards and panels covering subjects or areas of work. There was a large professional secretariat. Members of the committees, boards and panels were drawn from a similar range to the Council. There was a gradual increase of representatives from the polytechnics and colleges. Large numbers of academic staff served voluntarily; in the late 1970s there were around 100 boards and panels involving around 1000 members.

CNAA did not prescribe content or structures of courses; institutions put forward their own course proposals which had to meet CNAA's general educational criteria as well as conforming to regulations about matters of detail. The primary aim of any programme had to be the development of intellectual and imaginative skills (CNAA 1987). Whilst studies were directed towards greater understanding, the Council also emphasised competence. Programmes could include the acquisition of skills or techniques, but they had to stimulate an enquiring analytical and creative approach. An element of interdisciplinarity was required.
CNAA operated at two levels in relation to its institutions. First it scrutinised and ‘validated’ individual courses. Second, the institutions had to offer an environment suitable for study at the level of the course. To achieve this, the CNAA was drawn into addressing wider issues, including scrutiny of internal structures of institutions. CNAA developed quinquennial institutional reviews, to establish the suitability of an institution to offer its courses.

Validation
The CNAA validation process centred on the course submission - a substantial document which set out the aims and objectives of a course, its entry requirements, structure, content and syllabuses, assessment procedures, facilities and staffing. If the appropriate Board of the Council considered the submission to be ‘of sufficient merit’ (CNAA 1979), it would arrange for a visiting party to discuss the course with the college. The discussion involved all the course team as well as senior staff of the institution. Courses were approved for five years, after which institutions had to apply for revalidation.

CNAA validation procedures were rigorous, and many of the colleges found it difficult to get approval. Wider issues than simply the content of courses became prominent. Approval could be withheld because of staffing and accommodation problems, or concern over library provision. Astute colleges were able to use CNAA’s concerns to argue for resources from their local authorities.

Institutional reviews
From the outset the CNAA had sought a changed administrative and organisational environment in its institutions from the old hierarchical tradition. Institutional reviews, conducted every five years, following a similar pattern to validation of individual courses, with preparation of a statement by the institution of its arrangements and the academic environment, and a visit from a CNAA visiting party, often involving large numbers of the institution’s staff. The CNAA considered the physical and academic resources of a college and its structures of academic governance. There was a particular concern with the health of the new academic boards and their systems for continuing scrutiny of courses. CNAA also affirmed the link between teaching and research, and during validation, enquired into the research undertaken by staff to ensure the currency of their expertise. The original proposals for a binary system had not envisaged research in the polytechnics. But the Council expected a significant proportion of staff teaching courses leading to CNAA awards to be engaged in
research. The CNAA could impose stern conditions as a result of review visits to institutions, and even threaten the future of an institution. Quinquennial review visits became increasingly prominent.

**The changing relationship with institutions**
The arrangements described so far are, broadly, those in operation during the first decade or so of the CNAA's existence.

The relationship between the Council and its institutions was always ambivalent. The CNAA had facilitated the development of degree level work in a way that had not hitherto been possible. It had supported the development of research degrees and promoted research in polytechnics. The courses were often innovative and of high standard. Yet the polytechnics and some other major institutions were chafing at its processes and often at its existence. The relationship between the institutions, particularly the polytechnics, and the CNAA was not always smooth. Even in the early years, the polytechnics looked forward to their own degree awarding powers, and anticipated the demise of CNAA. As time went on, the polytechnics became increasingly fractious about the constraints of the CNAA. The situation was paradoxical; institutions under central bureaucratic control were more innovative than those with the autonomy that they aspired to.

The reasons for this lay, as Pratt (1982) argued, in CNAA's processes. His argument went, broadly, as follows. The CNAA mechanism placed responsibility for initiative with institutions. Institutions themselves designed and argued for their courses. The CNAA's procedures required the proposers to show how their courses were justified in economic, social and educational terms, to demonstrate their intellectual coherence and progression and to justify teaching and assessment procedures. It was this process of argument that was the key to CNAA's success. For if proposals had to be argued before a body of people as knowledgeable as the proposers' basic assumptions were exposed and had to be justified. Often, course teams found that existing assumptions and conventions did not stand up to questioning and this promoted innovation. A further element was the way in which CNAA required the whole course team to be involved in the validation of courses. This offered junior members of staff opportunities for questioning the assumptions of their established colleagues.
There were arguments on the other side, too. CNAA's procedures required vast amounts of information and were costly, particularly in time of staff involved. Approval of a single CNAA course could involve a stream of lengthy documents, substantial and extended correspondence, and a meeting involving a dozen or more staff for a day, to say nothing of preparation time. Many institutions were seeking validation of dozens of courses in their early years. The demands of institutional reviews were similar, but often involved several hundred members of the polytechnic staff.

There were problems relating to the nature of interactions between the institutions and the Council. These were inquisitional, despite CNAA's efforts to promote 'dialogue'. Colleges put forward proposals to be judged. It was difficult to be wholly frank if the course could be closed as a consequence. There was danger of discussion centering on the satisfaction of bureaucratic, rather than educational issues (Locke et al 1980). It was clear that, despite its capacity to validate innovative courses, there was frustration at the Council's conservatism and procedures. The courses put forward to CNAA often challenged the appropriateness of CNAA structures to cope with innovation, as well as the conceptions of CNAA members as to what constituted knowledge and the essential features of a degree.

As the sector developed, and new course development gained momentum, CNAA validation procedures became a treadmill, with ever increasing numbers of meetings and visits. The extent and detail of scrutiny created concern in the institutions, and in the Council itself. As a result of all these concerns, CNAA repeatedly examined its procedures and tried to establish new forms of relationship with institutions. It sought ways of giving increased responsibility to institutions, whilst retaining a central function. Putting this into operation was to prove more difficult and contentious than envisaged.

**Partnership in validation**

In 1975, CNAA introduced the concept of 'partnership in validation'. CNAA was unwilling to go as far as delegating authority for approval of courses, pursuing instead the idea of 'internal validation'. Particular institutions were to be authorised to carry out the 'main validation procedures' leading to the approval of courses in 'well established subject areas', subject to quinquennial review. The Council recognised 'the existence within a number of institutions of high quality academic work, experience, maturity, constructive self-criticism, and effective and thorough academic decision making processes.' But following the consultation process
on this idea, CNAA concluded that the benefits of its present system outweighed those of a new, less secure form of validation. One argument that emerged (Silver 1990) was that self-validation was not necessarily an ideal system. It existed in universities for historical reasons only: the CNAA system had the advantage in drawing on much wider academic expertise than could be offered within a single institution. It might have been argued that universities in countries like Austria did not have the academic autonomy of those in the UK; their academic programmes were subject to both ministerial and Parliamentary scrutiny.

After further discussion, CNAA set up a 'Committee for Institutions' in 1979 to coordinate institutional reviews and course validation and to monitor 'the interplay between the internal procedures of the institution and the Council's procedures for the approval of courses'. A new form of 'Partnership in Validation' proposed improvement of procedures for the initial approval of courses, indefinite periods of approval, and replacement of the process of the renewal of approval of courses by 'progress review' visits. The limits within which institutions could change approved courses were extended.

Institutional accreditation

In 1986 the CNAA proposed a further change - a system of institutional 'accreditation'. Accredited institutions, expected to be mainly polytechnics and the Scottish central institutions, would have authority to validate and approve their own new courses and review and modify existing ones. All CNAA institutions also would be able to confer awards in their own name on Council's behalf.

Again there was much discussion of the detail, but under the arrangements finally agreed, institutions had to apply for accreditation and be visited by a panel from the CNAA Institutions Committee. If successful they operated under an 'Instrument of Accreditation', which required them to observe the Principles and Regulations of CNAA, review courses at intervals of not more than seven years, and provide the Council with regular reports. Validation and review arrangements had to include people from outside the institution and at least one person with experience in industry, commerce or a profession. CNAA would review the institution at intervals of not more than seven years, and it could withdraw accreditation if the institution was found to be failing to maintain standards or comply with the conditions of the Instrument. In 1987, Council extended these arrangements to cover accreditation of research degree work as well as taught courses.
By September 1988, 26 polytechnics had obtained accreditation for taught courses, as well as a college of higher education and two Scottish central institutions, and eight polytechnics were accredited for research degree programmes. By summer 1989, all the polytechnics in England and Wales were accredited for taught courses.

**Degree awarding powers**

Despite the changes in CNAA's mode of operation, the pressure from the polytechnics for degree awarding powers continued. Indeed, it was reinforced by their independence from local authorities in 1989. There was also the imminence of the reviews of the first round of accreditations, due to begin in 1992. Institutions were reluctant for their accreditation to be reconsidered.

Two reports in 1990 (HMI 1990; Bird and Callaghan 1990) broadly supported the polytechnics' ambition for greater freedoms and raised questions about CNAA's future. Neither actually proposed its abolition, though the HMI report thought it 'increasingly vestigial'. The Bird Report raised the possibility that CNAA could merge with the recently established Universities Academic Audit Unit to act as a quality assurance body for the whole of higher education.

Government decision was delayed but in 1991 (DES 1991) it announced that the polytechnics and other major institutions were to have degree awarding powers and that CNAA was to be abolished. Other non-university institutions would have to seek validation from those with degree awarding powers. A single new academic audit unit would be set up. 'Quality assessment' of provision would be the responsibility of the new funding councils and would be expected to inform funding decisions.

In 1992, the polytechnics and some other colleges at last acquired degree awarding powers and university titles. All the universities, including the former polytechnics, now came under external scrutiny of new quality assurance mechanisms. Distinction was made between quality 'audit' - of the institutions' processes for quality assurance - and 'assessment' of the quality of education provided through courses. The new system for quality audit was to be one of 'self-regulation. A Higher Education Quality Council was set up in May 1992, funded by subscription from all universities and colleges of higher education.. It carried out regular 'audits' of institutions' quality assurance processes (similar to CNAA accreditation reviews)
and acted as a quality enhancement service. The new funding councils, which allocated government money to the institutions, carried out assessment visits of teaching in each of the main subject areas of each institution. In 1997 the two mechanisms were combined when the Quality Assurance Agency for Higher Education was established, jointly owned by the institutions and the funding councils.

Conclusion

What can we learn from the British experience? The history of the CNAA demonstrates the benefits and the drawbacks of this kind of accreditation model. The subsequent developments indicate that there are continuing problems of accreditation and quality assurance in higher education.

CNAA was undoubtedly successful in its prime function of giving academic validity to courses in emerging institutions.

It was successful, too, as an instrument of broader policy. The quality assurance processes of the CNAA were an essential element in the development of the binary policy in Britain, and of its leading institutions, the polytechnics. It enabled the polytechnics and other colleges to achieve the growth of higher education provision, particularly degree courses, that had been the aim of the 1960s policies.

CNAA facilitated the educational innovation, paradoxically by the involvement of academic conservatives and through bureaucratic procedures. According to Robinson (1995), CNAA was the most significant educational institution in Britain in the second half of the twentieth century, and by the 1990s it was awarding more degrees than all the British universities put together. Its national standing and the rigour of its procedures enabled it to secure acceptance for courses that might otherwise have been regarded as of doubtful standard, because of their novelty or unfamiliarity with their institution.
It enabled institutions to move from subordination to the universities for degree courses, to be 'self critical academic communities' and thus enabled them to achieve degree awarding powers in the 1992 Act.

But this account of the life and death of the CNAA shows that it was a complex and changing institution. The scale of its operation was considerable. And whilst the CNAA was an important part of British policy for higher education for nearly 30 years, there was not a single 'accreditation model' in Britain. In terms of lessons for other countries, this is important, for it is difficult to be sure what was actually available for transfer. The way CNAA operated in the late 1980s was not the way it had in the 1960s, yet the Austrian accreditation model (the FHR) most closely resembles CNAA of the 1960s. The evidence from our research is that policymakers in Austria had an ill-informed and idealised understanding of the CNAA. Paradoxically, this may have helped to achieve policy transfer!

The British experience raises a question of whether the sorts of changes that CNAA underwent were inevitable. Any accreditation body changes the institutions and circumstances in which it operates. The CNAA was successful as a facilitator and guarantor in course development. Central in its achievements were its collegial processes, particularly the discussions and meetings that took place on institutional visits. It was these that had facilitated the liberalisation and innovation in higher education in the polytechnics and other colleges. They involved more than the processes of peer review, important though these were. CNAA created a national network of people and institutions, disseminating its ethos and principles, and developing practice in its various subject areas.

As the British polytechnics matured, it was no longer acceptable or possible for an external body to consider individual courses in detail. As it offered increased responsibility to institutions, the positive benefits of its operation, especially that of encouraging innovation and a sense of corporate identity for the sector, became lost. As Pratt (1997) put it: ‘collegiality disappeared; only the bureaucracy was left.’ The increasingly competitive financial climate damaged collegiality (Pratt and Hillier 1991). How could institutions disseminate their innovative strategies when their survival depended on having a competitive edge? CNAA's function changed to become an accreditor of institutions rather than a validator of courses. Gradually, quality assurance has become a matter of 'policing' rather than facilitating educational development. This is a fundamentally different kind of activity.
CNAA's relationship with institutions was always equivocal, and sometimes stormy, so that its
demise in 1992 was barely regretted. CNAA's successes were neglected in the rush to
independence of the polytechnics. Yet the abolition of CNAA and the unification of higher
education in Britain does not appear to have solved many problems. The accreditation
systems which replaced CNAA have been subject to as much, and sometimes more,
criticism. Self-regulation through HEQC lasted only a few years. There is widespread concern
today about the quality assurance procedures of the QAAHE. They are highly bureaucratic,
expensive and time-consuming. Strong doubts have been expressed about the validity of their
judgements on teaching quality. There is concern about the value of the qualifications
framework. It is clear that the systems will have to change yet again.

This is an outcome of nearly 40 years of policymaking that any country would do well to avoid.
In a situation where most governments are seeking to de-regulate higher education and
permit multiple providers to offer courses, British experience of what has worked and what
doesn't could be pertinent.

References

Awards London, DES.
DES (Department of Education and Science) (1991) Higher Education: A New Framework,
London, HMSO Cmnd 1541.
HMI (Her Majesty's Inspectorate)(1990) A Survey of Validation and Review Arrangements for
Polytechnic: Monitoring the Polytechnic's Performance CIS Commentary No 15, Centre
for Institutional Studies, North East London Polytechnic.

--- (1991) *Alternatives to Universities* Paris, OECD.


