

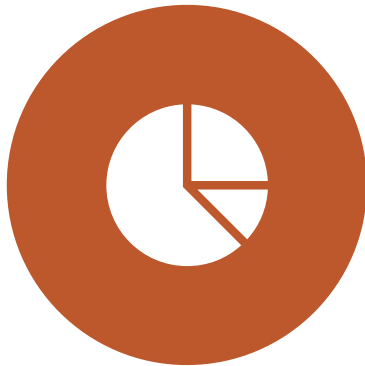


INTERNAL MECHANISMS FOR CONSISTENCY OF EQA PROCEDURES AND DECISION MAKING: COMMISSION FOR UNIVERSITY EDUCATION - KENYA

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OUTLINE



**LEGITIMACY OF THE
EXTERNAL QA
AGENCY**



**CONSISTENCY OF
EXTERNAL QA
PROCEDURES.**



**DECISION-MAKING:
INDEPENDENCE AND
AUTONOMY**

PREAMBLE: EQA Agencies and Systems

1. EQA Agencies exist to assure and enhance quality through quality assessment (review and evaluation) against minimum standards for accreditation purposes; and quality audit of the internal quality assurance mechanisms against audit criteria for improvement purposes. The minimum standards and criteria are agreed upon by key stakeholders during development, validation, and review, from time to time.
2. Quality Assurance can be internal (self-assessment), or external by the EQA Agency for value judgement and a decision on whether the HEI institution/programme meets minimum standards for accreditation; or whether the IQA mechanisms are adequate (Challenges: **subjectivity and lack of consistency of expert decisions**).
3. QA processes are people driven, and the people are in the HEIs, in the QA Agencies as staff or peer reviewers, and selected stakeholders
4. The QA Agencies/systems that carry out QA processes are at varying levels of maturity - more established in some countries, just emerging in others; may be fully institutionalised or at various stages of institutionalisation.
5. EQA Agencies may be fully autonomous, semi-autonomous, or may have little or no autonomy.

This has a bearing on the internal measures that are put in place to ensure consistency of EQA procedures and decision making.

Bottom-line: all Agencies must establish internal measures to ensure **consistency** and **reliability** of their QA **procedures** and **decision-making**.

PREAMBLE: EQA Agencies and Systems

7. The quality assurance agency (QAA) is first an organization with its own internal structures and processes

8. **Quality is not a static condition** that an institution attains and maintains but a moving target, that is dependent on the interests of different stakeholders at different times.

9. **Quality in HEIs** has to be enhanced through regular **internal self-assessment**, and **external validation** by a relevant Agency.

Bottom-line: **Consistency** of the **procedures** and **decision-making of the** EQA Agency's is highly dependent on **the legitimacy of the Agency**, and the effectiveness of the **Internal QA Systems in HEIs**.

Major concerns of EQA agencies and HEIs

1. **Inconsistencies:** when **variability** in QA procedures and criteria leads to **unreliable results or outcomes** of QA processes
2. **Bias:** When **subjectivity** interferes with the accuracy and validity of the results and value judgement; and hinders credible **decision-making**

Concern: How to ensure the consistency of EQA procedures and decision making

This presentation: What internal measures are in place to ensure the consistency of EQA procedures and decision making at your national commission?

Introducing the EQA Agency: Commission for University Education, Kenya

EQA Agency: Commission for University Education; - only EQA agency in Kenya

Status: Semi-Autonomous government agency

Establishment: by an Act of Parliament, first in 1985 as the Commission for Higher Education (CHE) to regulate Private Universities and post-secondary school institutions; later succeeded in 2012 by the Commission for University Education to regulate Private and Public Universities, and specialised degree-awarding institutions.

Higher Education Institutions: 79 Universities (43 public, 36 private)

Legitimacy: A credible organisation recognised and accepted nationally, regionally, Internationally

Higher Education Area: The East Africa Community Common Higher Education Area (EAHEA, 2017)

Collaborations and networks: IUCEA, INQAAHE, KUQAN, EAQAN, AfriQAN

Standards and Guidelines: Universities Standards and Guidelines (Kenya); EA Standards and Guidelines for QA, Africa Standards and Guidelines for QA (ASG-QA), the International Standards and Guidelines for Quality Assurance in Tertiary Education (ISGs), especially the Guidelines for Good Practice.

LEGITIMACY, CONSISTENCY, DECISION-MAKING OF THE EQA AGENCY:

1. LEGITIMACY: EQA Agency is a Credible, Recognised, and Accepted Organisation

Legal and Organisational Framework

Resources

Internal QA and
Accountability Mechanisms

1.
Legitimacy

Legitimacy of the EQA: Internal Measures at CUE

Legal and Organisational Framework

- An established legal framework: The Universities Act spells out the mandate, functions and establishment of CUE as a semi-autonomous **regulatory agency** for university education;
- Governance and management structures; the laws governing all its functions and legal protection from liability;
- Well-stated Vision, Mission, Objectives emphasizing the centrality of Quality Assurance
- Provisions of the Universities Act are operationalized in duly gazetted Universities Regulations and accompanying Standards and Guidelines

Resources

- Financial resources through the Ministry; and selected chargeable services;
- Human resources: Staff of the CUE spelt out in The Act, the Commission as the employer; highly competent staff, opportunities for professional development;
- A pool of external peer reviewers/resource persons
- Physical facilities: CUE premises on registered land.

Internal QA and Accountability Mechanisms

- Mechanisms for assuring quality of its own activities and processes institutionalised through robust policies, strategic plan, assigned responsibility, internal audit, risk, and compliance structures
- Quality audit and review by Standards Bodies through internal and external processes;
- Benchmarking

2. CONSISTENCY: Internal measures on external QA procedures

- Consistency in QA processes upheld by ensuring that:
 - the same **standards** are **applied uniformly, transparently and fairly** in similar processes, in every HEI, every time
 - Who is accountable for the procedures, processes, and decision-making?
 - Whose standards? (Agreed - upon by who and how?)
 - How are the standards applied?

A look at the EQA Agency and its internal mechanisms: Can they be **trusted**?

CONSISTENCY: Internal measures in the External QA Framework

I. EQA
Agency and
HEIs

II. QA
Standards
and processes

III. External
Review Process

CONSISTENCY: I. EQA Agency (CUE) and HEIs

- Recognizes HEIs' primary responsibility for QA; their autonomy, and academic freedom (constitutional)
- Promotes institutionalization of IQA mechanisms in HEIs through regulations, standards and guidelines (development of policies, appointment of QA Officers, budgets, organization structure)
- Developed requisite instruments to guide HEIs on Internal QA processes and preparation for external assessment (evaluation/review) and Quality Audit (Programme and Institutional Accreditation and Audit tools accessible on university portals)

CONSISTENCY: II. EQA Standards and processes

- Universities Standards and Guidelines/criteria are developed through a participatory process with engagement of key stakeholders during the development, validation, and review (hence agreed-upon)
- Universities standards address all aspects of the HEIs that fall within the scope of functions of the CUE and the objectives of university education (spelt out in the Universities Act and the Regulations)
- The standards/criteria for external assessment (evaluation/review) and Quality Audit comprehensively cover all aspects of Institutional and Programme Accreditation and Audit; ODeL, Research and Innovation, Internal QA and Benchmarking, Infrastructure, ICT, Library and Information Services tools accessible on university portals)
- The QA instruments are accessible to HEIs and stakeholders on the CUE website

CONSISTENCY: III. External Review Process (accreditation and audit)

- Based on HEIs internal **self-assessment reports** carried out and submitted according to published guidelines
- Carried out by **peer reviewers/resource persons** selected from **a database** of prequalified experts with requisite qualifications and experience in line with the Universities Regulations and the procedure for pre-qualification, selection, and commissioning
- External review or audit **panels are constituted for each assignment** through a documented procedure that includes selection, no-objection by the HEIs, declaration of independence, commissioning and induction, and compensation.
- External review **methodology, required evidence, and programme** are communicated to the HEIs in advance of the audit (including interviews, perusal of evidence and site visits)
- The **Self-assessment report, templates for report-writing, and value judgement instruments** are provided to each peer reviewer

3. DECISION-MAKING: INDEPENDENCE AND AUTONOMY

- a) **Organizational Independence of the EQA agency** – The governance and management of the agency is free of external interference
- b) **Operational independence** – The EQA Agency is able to freely implement its policies, procedures, and processes
- c) **Independence of formal outcomes** – EQA Agency is responsible and accountable for its decisions and outcomes

CUE is recognized and respected as a legitimate organization in Kenya, in the region, the African Continent, and Internally

3. **DECISION-MAKING: External Evaluation/Peer review Process**

- Transparent professional evaluation and judgement on the HEI/Programme by a competent and independent expert panel based on clear criteria
- The composition of the expert panel, evaluation approach, criteria for judgement, and possible verdict are made known to the HEI in advance (the HEI may object to inclusion of any member of the proposed panel)
- To ensure that the criteria are applied consistently, each expert panel is inducted for each specific HEI and process (introduced to the SAR, criteria, instruments, procedure, roles, the 'do's and 'don't's)
- The reports of individual reviewers are consolidated into a final report
- The report is made available to the HEI for verification and correction of any errors before the final report is produced.

3. **DECISION-MAKING:** Approval Process

- The external review reports are presented to the relevant committee of the Commission for interrogation, adoption, and recommendation to the Commission for approval (The decision is owned by the Commission, not peer reviewers)
- The final report and verdict is communicated to the HEI in writing
- Implementation of recommendations is monitored through progress reports submitted regularly by the HEIs
- The report is made available to the HEI for verification and correction of any errors before the final report is produced.

3. DECISION-MAKING: Appeals mechanisms (Universities Regulations, 2014, Regulation 85)

85. Any person or institution who or which is aggrieved by an act or decision of the Commission taken in accordance with any of the provisions of these Regulations, who desires to question that act or decision, or any part of it, may, within thirty days of the date of such act or decision, appeal in writing to— Appeals.

- (a) the Commission which shall review and decide on the matter in question and respond within a period of three months; and
- (b) thereafter to the Cabinet Secretary, if not satisfied with the decision of the Commission, and the Cabinet Secretary may give such orders or instructions as may be deemed necessary.

3. DECISION-MAKING: Other issues

- CUE core values include Integrity, Professionalism, Accountability, and Responsiveness
- Disclosure mechanisms for the Board, and peer reviewers, and Code of Conduct for staff
- Internal and external stakeholders (those who affect or affected by the decisions of CUE) are clearly defined in the Strategic Plan, and stakeholder engagement is a strategic.
- Disclosure is done within the parameters of the legal framework

Challenges on consistency in procedures and decision-making

- Inadequate staffing: dependent availability of funds and affected by policy changes in public service, affects adherence to timelines
- Financial constraints: affect ability to carry out all necessary EQA Activities
- Reluctance by HEIs to disclose weakness in the IQA system
- Decline in availability of experienced peer reviewers
- Inability to implement some decisions that are the preserve of the Minister
- Externally driven changes to the legal framework
- Fast changing HE landscape with endless alternatives outpacing review of EQA processes

CONCLUSION

Consistency builds a reputation of reliability for the EQA Agency and wins trusts in its processes and decisions.

Therefore, until we all develop a new approach to QA, we must:

- pay attention to the quality of QA tools, with timely reviews when necessary;
- invest in the expertise of the people who apply the QA tools;
- guard the organizational, operational and decision-making independence of the Agency;
- proactively embrace change; and
- open the QA agency to scrutiny.

THANK you