

Resistance is useless? The impact of policy change and accreditation practice in post-Bologna Germany (0119)

Although Bachelor and Master degrees have been implemented throughout German higher education and the present student generation therefore has little concept of how their peers of former times studied, many professors still hanker after a time when they were effectively answerable to no-one, where they did not have to evaluate their teaching, or even liaise to any great extent with colleagues on the contents of degree programmes. This paper, which results from interviews with relevant stakeholders in universities and technical colleges, examines the policy changes that have occurred and influenced the German higher education sector. It will reflect on quality assurance processes and the benefits or deficits that these have. Lastly, it will prognose how tertiary education in Germany may develop in the future.

Resumée of the three key players in German higher education: the KMK, AR and HRK

German higher education (funding bodies apart) is led by three groups: the Culture Minister Conference (*Kultusministerkonferenz* – KMK), the Standing Rector's Conference (*Hochschulrektorenkonferenz* – HRK) and the Accreditation Council (*Akkreditierungsrat* – AR). The KMK consists of Germany's 16 Ministers of Culture, whose members convene to maintain parity of academic standards in teaching and learning and to ensure the greatest amount of mobility among the student generation (<http://www.kmk.org/wir-ueber-uns/aufgaben-der-kmk.html>). It issues general guidelines (*Strukturvorgaben*) which can be applicable to all, or specific to particular *Länder*. In its present form the HRK consists of 266 members from state institutions and state-approved institutions (June 2011) and presents and promotes the interests of the tertiary sector to government. The Accreditation Council (*Akkreditierungsrat*), which was founded in 2005 after a joint agreement by the KMK and HRK, makes recommendations to the sector and accredits the independent accreditation agencies responsible for accrediting degree programmes throughout Germany.

In the ten years since the Bologna Declaration was signed, German HEIs have restructured their degrees, replacing the former *Diplom* and *Magister* qualifications with Bachelor and Master programmes, a process which, although far advanced, is still not complete. Many German professors still bemoan the changes caused by the Bologna Process which has undoubtedly curtailed their academic independence, however, the *fait accompli* means that they have little choice in the matter but to adapt themselves to it. Two factors can be identified to have occurred in the last ten years: firstly, the professors had little understanding of the nature of modularisation and often superimposed the contents of the former *Diplom* upon Bachelor degrees, which is still partially the case today (cf. Terhart, 2007). Secondly, as was typical of *Diplom* or *Magister* courses, an examination would usually be taken at the end of each teaching block, which was not modular in its concept and led to an overload of examinations. At present, there is much discussion of the need for a „reform of the reform“, to modify existing Bachelor degrees, thereby reducing the workload and removing some contents which are more suitable to Master programmes. In October 2009 the KMK issued a resolution in which it highlighted the many problems which still needed resolving, notably to reduce the number of examinations, increase student mobility, and clarify accreditation procedures.

The implementation of quality assurance and the role of accreditation agencies

Professors, who had in the past enjoyed largely independent status, had to accept that with growing quality assurance mechanisms they were becoming more accountable for what they were doing and also needed to work collaboratively far more than was previously the case. However, the extent to which teaching evaluations were conducted was not determined at national level and there are

considerable differences in the extent to which each HEI conducts its evaluations of teaching. There also remains a certain amount of unclarity about who should bear the responsibility for this task. It is not uncommon for students to be responsible for carrying out evaluations. Nor is it precisely defined how the results of such evaluations should be made public. Although ENQA specifies transparency, the question remains as to who this information should be made available to and for what purpose: the students? Employers? Accreditation agencies? Future students? (cf. ENQA, 2011). The publication of evaluation results remains a thorny issue, with some HEIs assuming an open-house approach, whereas others only aggregate results internally. Recently, some HEIs have started producing quasi-legal documents which state how teaching evaluation should be implemented (*Evaluationsordnung*), but the production and implementation of these documents is still in its infancy.

If we examine the legal obligation for accrediting degree programmes throughout Germany (Mittag, 2006; Serrano-Velarde, 2008), we can identify a typically heterogenous scenario: only nine states have decreed a legal obligation to accredit degree programmes (mostly *before* a degree programme is introduced). Others recommend that these „should“ be accredited, whereas others again have decided that their institutions be autonomous and are alone responsible for the quality of their degree programmes, with no involvement from the respective Ministry. Although most HEIs accredit degrees before their introduction, thereby guaranteeing that the legal framework which accompanies a programme is in place, others accredit post-introduction, and in some cases students continue through a programme up to their final examinations with no official legal framework in place. As the cost of accreditation came under fire, the KMK recommended in December 2010 the implementation of system accreditation, whereby the quality assurance system of an *entire* HEI is assessed. If granted, the HEI no longer needs to conduct individual programme accreditation. Very few HEIs have undergone this process to date, and stakeholders are currently examining the use of institutional audit as an alternative (Ziegele, 2010).

Quo vadis, German higher education?

Due to Germany's federal structure, the ‚regulation‘ of higher education and rate of reform remains very much specific to each of the 16 *Länder*, even where the KMK or AR have made recommendations. Quality assurance, if compared with systems elsewhere, is in place, albeit with varying mechanisms and degrees of effectivity. If anything, the technical colleges (*Fachhochschulen*) have achieved far more consensus on their QA measures than have the universities. Here it is easier for students to compare standards. A national discussion on subject benchmarks, which universities achieved with the QAA in Great Britain, is at present unthinkable, as the author discovered when putting forward this suggestion at a national conference in December 2010. Although German professors are undergoing a slow *habitus* change, the rate at which this change is occurring is dependent on individual *Länder* politics and the direction the university management takes (a factor which is possibly far more influential than any other). It is not likely that a national quality assurance agency or agreement on QA measures will be reached in the immediate future, although the accreditation process has brought about a healthy amount of reflection on quality.

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