

20 Years of Efforts to Establish and Implement a Quality Assurance System in Greek Higher Education

Aggelos Kavasakalis

*Dr., University of Patras, Greece
Professor, Geitonas School
Email: a.kavasakalis@gmail.com*

George Stamelos

*Professor, University of Patras, Greece
Email: stamelos@upatras.gr*

Abstract *The establishment and implementation of a quality assurance system in Greek universities is a policy theme that always reinforced the conflict in the specific policy arena. Policy document analysis is used for the analysis of the efforts on producing and implementing such policies. Relevant data is drawn by a larger scale research, in which, higher education is considered as a policy arena where actors form networks that try to translate their common beliefs into public policy. Paper's hypothesis is that quality assurance policies in Greek universities are being developed following and in agreement with corresponding European education policies since Greece is both an EU member and a participant on Bologna process. Although these external influences result the establishment of relative to European developments legislative framework, Greek governments face hindrances during implementation of these policies. To overcome the intense and reactions they indirectly prompt evaluation of universities by various, not institutionalized, evaluation programs.*

Keywords: *Higher education; European education policies; Quality assurance*

1. Introduction

In the present paper we intend to analyze the efforts (and the difficulty) in the establishment and implementation of a quality assurance mechanism in Greek higher education in combination with corresponding "European education policies"¹. Our analysis will be divided in two sub-periods that are related with considerably occurrences so much of European educational policies in higher education in general what more specifically for policies on quality assurance.

The interest and pastime of European Union with the field of education policy is relatively recent and substantially is enacted with the signature of Maastricht Treaty, especially with the articles 126-127 (Stamelos and Vasilopoulos, 2004, 59-64). The first sub-period for the quality assurance policies it is completed in 1998. This year is very important at European level for two reasons: (i) the Recommendation on European cooperation in quality assurance in higher education is published (Official Journal of European Communities, 1998) and (ii) the process that one year later has been named "Bologna Process" begins at Sorbonne that has as a goal the formation of the European Higher Education Area (EHEA), where quality assurance is a central action line.

¹ By the term "European education policies" in this paper are comprehended education policies formed so much in EU level what in the wider European Area. The former are emanated by European Union bodies and exclusively concern the member-states. The later result with the cooperation of European states, not necessarily member-states, and these policies and actions influences the higher education systems of participating states in a wider European Area. "Bologna process" is an example of such a process in the sector of higher education that shapes the developments at the higher education systems of 47 states.

2. Methodology

This paper follows a qualitative research methodology which is, in contradiction with quantitative research, an “*empirical research where the data are not in the form of number*” (Punch, 2005, 3). For the needs of our research we use policy document analysis as a methodological tool. At this point a note about the analysis on policy documents is essential. As Atkinson and Coffey state “*we cannot treat records, however official, as firm evidence of what they report. This observation has been made repeatedly about data from official sources [...] it is important to establish a methodological framework for the analysis of documentary realities*” (Atkinson and Coffey, 2004, 58). Consequently, the data that are presented in these documents should be read with a critical spirit since they are not scientific texts that have been produced with concrete methods of analysis. And as Prior supports “*each and every document stands in a dual relation to fields of action. Namely, as a receptacle (of instructions, commands, wishes, reports etc) as an agent that is open to manipulation by others, and as an ally or resource to be mobilized for further action [...] So a further route of analysis for the researcher is to ask questions about how documents function in specific circumstances*” (Prior, 2004, 91).

The education policy documents under analysis were produced at two levels, the European and the national (Greek) level. At European level the documents relative to quality assurance higher education policy that have been analyzed were: Commission’s Recommendations, Green Papers, announces and Recommendation of the Council as they are published on Official Journal of European Communities, documents related to university evaluation programs, Ministerial Communiqué of the Bologna Process, etc. At national level the documents that have been analyzed were: the Law 2083/1992 (24th article), the relative to the Law Parliament Proceedings, the Draft Law of 2003, the Law 3374/2005 and the relative Parliament Proceedings, official policy documents related with international and national evaluation programs that Greek universities were involved, as well as published documents produced by key-actors that usually criticized the relative national policies.

3. Quality Assurance and Greek Universities Until 1998

3.1 Developments on Quality Assurance of Higher Education at European Level

Education policy as a field of concern in EU has small history. From 1958 until 1976 ministers of education of member-states were meeting informally, usually at the Council, with the occasion of European meetings. At the decade of 1980 slowly begins an activation of EU in the field of higher education policy. Succinctly the main official documents related with the quality assurance at European level in this sub-period are:

- Commission’s document: “Education and Training in the European Community. Guidelines for the Medium Term: 1989-1992”. In this document seven major action lines were analyzed and the “Improving of Quality of Education through cooperation” was one of them (Commission of European Communities, 1989, 15-16).
- The paper of European Commission on November 1991: “Memorandum on Higher Education in the European Community”. The European Commission proposes that the European higher education should take actions in five specific fields². It also supports that there are certain horizontal subjects of fundamental importance. The accent for the maintenance and improvement of quality of higher education is one of these horizontal subjects (Commission of European Communities, 1991).
- 20 days later, on 25 November 1991, the meeting of ministers of education in Council lead to proposals related with the quality assessment on higher education:
“*The increasing importance of the European dimension in general and more particularly the introduction of a single market will widen the range of interested parties concerned with quality in higher education in each Member State. [...] arrangements for quality assessment in higher education on a national level could be examined at Community level, with a view to reinforcing national quality assessment systems and to providing a way to improve the mutual recognition of diplomas and periods of study. Given the diversity of method used for quality assessment on the national level, national experience could be complemented by European quality assessment experience, without affecting existing responsibilities and powers in the Member States and the autonomy of higher education institutions*” (Official Journal of European Communities, 1991).

² The attendance and access in higher education, the collaboration with the economic life, the life-long education, the open and distance education and, the European dimension in higher education.

In this period is also takes place the first EU project, named: “European Pilot Project for Evaluating Quality in Higher Education”. This pilot project had two years duration and resulted an enormous impact³ on the growth of a methodology of an evaluation of quality of higher education institutes based on a double system of internal evaluation and visits of external experts (Thune and Staropoli, 1997; Mora and Vidal, 2005).

The “Institutional Evaluation Programme” (IEP) which were designed and implemented by the European University Association (EUA) also begun in 1994. This programme has been designed to ensure that higher education institutions gain maximum benefit from a comprehensive evaluation conducted by a team of experienced European higher education leaders. The initial aims of the Programme were the consolidation of the belief that quality assurance procedures are necessary for universities and that higher institutions should by themselves entered the programme.

3.2 *Developments on Quality Assurance of Higher Education at National (Greek) Level*

3.2.1 The Law 2083/1992

The first law that enacted evaluation processes for every activity of a higher education institution was voted in 1992 by a conservative government (New Democracy administration - ND). The 24th article of law (2083/1992) titled: “Evaluation of activities of Higher Education Institutions” was promoting the enactment of an evaluation system of Greek universities. The legislator settled that in the evaluation should “*be taken under consideration the official planning of each Higher Education Institution (HEI)*” (article 24, paragraph 1, Law 2083/1992). It has to be mentioned that in the second article of the Law had been determined that the Senate had the responsibility for the preparation of the official planning of the university. The law also established a connection between the results of the evaluation process with the extra public funding of the university. The legislator regulated the creation of an “*Evaluation Committee*” determining its composition. The evaluation method, the criteria and indicators were not determined, although the law forecasted the procedure under which the research for the best international practices would take place (Law 2083/1992).

Universities had traditionally a generalized mistrust towards the Ministry of Education (MoE). This mistrust was intensified by the general philosophy in the law, according to which the result of the evaluation could have unfavorable repercussions on the evaluated institution, since it could influence a part of the public funding. It was therefore considered that the particular law enacted an evaluation process with “punishment” repercussions and as a result, actors (individual and collective) were activated and reacted in the implementation of the provisions of article 24 of the Law 2083/1992.

The analysis of Parliament proceedings results that the representatives of the governmental conservative party (ND) were in favour with the belief that the result of an evaluation process should lead to ranking. Furthermore, in their effort to particularise the possible criteria of the evaluation process the representatives of the ND party gave importance in the connection between the statuses of academic studies with the success of graduates in the job market. They also promoted the significance of competition between universities and/or departments. The representatives of the majority opposition, at that time, the social-democratic party (PASOK) criticised the possible total dependence of the evaluation process to the MoE. They also considered as a better choice the evaluation process to be assigned in international bodies that are not part of the Greek higher education system. The representative of the minority Left-wing opposition party (SYN) focused the critique on the fact that “*[the minister] has the absolute majority of the Evaluation Committee which has 9 members. Since he has 4 naming members it is very likely one from the 5 rectors will be with the side of the minister and consequently acquires the necessary majority [...] This Evaluation Committee will determine the specific criteria, the performance indicators, the necessary time for evaluation to take place, and in general the evaluation process and the distribution of public financing of HEP*”. The representative of Greek Communist Party (KKE) supported that he cannot analyze and discuss the specific regulations of the law’s articles and comprehend the notion of evaluation. He stated that the confrontation of the acute problems of Greek university and the insurance of the essential resources for its operation should precede and only then someone could discuss and analyse the notion and the methods of evaluation (Parliament Proceedings, 1992a-f).

Substantially, under the weight of reactions mainly inside universities the provisions of article 24

³ 47 higher education institutes on 17 different countries participated in this programme.

were not activated and the proposed evaluation system of universities was never applied. The article was finally suppressed by the next government (PASOK) with the law 2327/1995 that enacted the National Council of Education (ESYP).

3.2.2. Greek Higher Education Institutes and Evaluation Programmes

The Greek MoE realising the difficulty and the intensities that had been caused in Greek universities tried progressively to promote a positive evaluation climate and a quality culture in Greek higher education. Thus, MoE tried to promote the involvement of higher education institutions and/or Departments into international evaluation programmes. The intention was that actors inside universities and social partners should begin to acquire a background of knowledge and experiences on evaluation processes in higher education.

Therefore, in the European pilot program “European Pilot Project for Evaluating Quality in Higher Education”, implemented in 1994-95, two Greek institutions were participated (MoE, 1996). In addition, up to present eight Greek higher institutions have been evaluated by the EUA’s International Evaluation Programme.

4. Quality Assurance and Greek Universities from 1998 up to Now

4.1. Developments on Quality Assurance of Higher Education at European Level

On 1998 at EU level the “Recommendation of Council of 24th September 1998 on European cooperation in quality assurance in higher education” was published. This document was the first European step (the second was the foundation of ENQA)⁴ for the entrance of quality assurance of European universities at the top of European education policy agenda. In this official paper it was recommended that transparent evaluation systems of quality should be supported and be created. The aim of these actions was not only the safeguarding of quality in the European higher education but also the growth of co-operations between both at states-members and at European-supranational level (Official Journal of European Communities, 1998, 57-58).

At “Bologna Declaration” in 1999 quality assurance was mentioned in one sentence: “*Promotion of European co-operation in quality assurance with a view to developing comparable criteria and methodologies*” (Bologna Declaration, 1999, 3). However, in combination with the Recommendation of Council on 1998 many European states decided the creation of national independent quality assurance agencies. This development is also stated on the “Trends I” report: “*Apart from the quality assurance mechanisms which are in force or are developing at the institutional level, more and more countries establish external evaluation or quality assurance bodies or agencies [... but] the level and scope of the evaluation procedures vary from country to country*” (Haug, Kirstein and Knudsen, 1999, 36).

In 2000 ENQA is founded. This development is connected so much with the conclusions by the pilot programme of quality assurance in 1994-95, what by the specific proposals in the Recommendation 98/561/EC of the Council of European Communities.

In the next ministerial communiqué of the Bologna Process at Prague 2001, there was an extensive mention on quality assurance. Specifically, the ministers:

“recognized the vital role that quality assurance systems play in ensuring high quality standards and in facilitating the comparability of qualifications throughout Europe. They also encouraged closer cooperation between recognition and quality assurance networks. They emphasized the necessity of close European cooperation and mutual trust in and acceptance of national quality assurance systems. [... they] called upon the universities and other higher education institutions, national agencies and the European Network of Quality Assurance in Higher Education (ENQA), in cooperation with corresponding bodies from countries which are not members of ENQA, to collaborate in establishing a common framework of reference and to disseminate best practice” (Bologna Process, 2001, 2).

In Berlin on 2003, 40 ministers of education decided that they should focus their efforts for the next two years in three out of nine action lines, with quality assurance to be one of them. They proposed, that all Bologna signatory countries should form national quality assurance systems with common features⁵ up to

⁴ The present name of the association (initially network) of ENQA is: “European Association for Quality Assurance in Higher Education”.

⁵ “(a) A definition of the responsibilities of the bodies and institutions involved, (b) evaluation of programs or institutions, including internal assessment, external review, participation of students and the publication of results, (c) a system of accreditation, certification or comparable procedures, and (d) international participation, co-operation and networking” (Bologna Process, 2003, 3).

the next meeting on 2005 (Bologna Process, 2003, 1 and 3).

In October 2004 another Recommendation related with the quality assurance of European higher education is publicized. This Recommendation led to five concrete measures that, as it was declared, contribute in the mutual recognition of quality assurance systems and of evaluation efforts in the European higher education. Succinctly, (i) all institutions should import or develop internal quality assurance mechanisms, (ii) national quality assurance agencies that already exists should apply the specific elements of quality assurance that are reported in the Council Recommendation of 1998, (iii) quality assurance agencies should cooperate with the ENQA so that a “European Register of Quality Assurance and Accreditation Agencies” to be formed, (iv) institutions should have the possibility to select by the Register the Agency that will perform their evaluation, and (v) higher institutions should accept and use the results of the evaluation by the quality assurance agencies as the base for their future decision-making (Commission of the European Communities, 2004, 10-11).

In Bergen 2005 ministers of education adopted the proposals of the report “Standards and Guidelines for Quality Assurance in the European Higher Education Area - (ESG)” for the three levels of standards and guidelines on the quality assurance that was submitted by the E4 group⁶ (ENQA, 2005). They also decided to investigate on the progress during the next two years in the implementation of the standards and guidelines for quality assurance as proposed in the ENQA report (Bologna process, 2005, 5). The three main levels of standards and guidelines in the report was the internal evaluation, the external evaluation and the rules that will condition the creation and operation of the independent national quality assurance agencies. Therefore, in this paper there has been an effort to specify the processes of quality assurance in three levels: in the level of higher institution (internal quality assurance), in the systemic level (external quality assurance) and finally in the level of the “controllers” (evaluation of quality assurance agencies and proposal for the establishment of European Quality Assurance Register - EQAR).

The next year (on 15 February 2006) the Recommendation of the European Parliament and of the Council “on further European cooperation in quality assurance in higher education” was published in the Official journal of the European Union (Official Journal of the European Union, 2006). In this Recommendation all the proposals that had resulted by the previous EU developments, but also many parts of the ministerial communiqué in Bergen of Bologna process was promoted.

The ministers of education in their communiqué at London 2007 declared about the model for the EQAR that:

“we welcome the establishment of a register by the E4 group, working in partnership, based on their proposed operational model. The register will be voluntary, self-financing, independent and transparent. Applications for inclusion on the register should be evaluated on the basis of substantial compliance with the ESG, evidenced through an independent review process endorsed by national authorities, where this endorsement is required by those authorities” (Bologna Process, 2007, 4).

Two years later on the ministerial communiqué at 2009 the progress on the quality assurance action line, so much with the extensive implementation of ESGs what with the creation of EQAR was positively commented (Bologna Process, 2009, 2). Further objectives on the quality assurance in the EHEA were set for the next decade: *“We ask the higher education institutions to pay particular attention to improving the teaching quality of their study programmes at all levels. This should be a priority in the further implementation of the European Standards and Guidelines for quality assurance”* (Bologna Process, 2009, 4). For the next three years (until 2012), the ministers asked the E4 group *“to continue its cooperation in further developing the European dimension of quality assurance and in particular to ensure that the European Quality Assurance Register is evaluated externally, taking into account the views of the stakeholders”* (Bologna Process, 2009, 6).

In the next ministerial communiqué of the Bologna Process at Budapest-Vienna the ministers based on assessment that took place with the help of stakeholders, welcomed the *“affirmation that institutions of higher education, staff and students increasingly identify with the goals of the Bologna Process”*. But as they also state *“while much has been achieved in implementing the Bologna reforms, the reports also illustrate that EHEA action lines such as degree and curriculum reform, quality assurance, recognition, mobility and the social dimension are implemented to varying degrees”* (Bologna Process, 2010, 1). For the next two years they asked the BFUG *“to propose measures to facilitate the proper and full implementation of the agreed Bologna principles and action lines across the European Higher Education Area, especially at the national and institutional levels”* (Bologna Process, 2010, 2).

⁶ E4 group: ENQA (European Association for Quality Assurance in Higher Education), EUA (European University Association), EURASHE (European Association of Institutions in Higher Education) ESIB, now-days ESU (European Student Union).

4.2 *Developments on Quality Assurance of Higher Education at National (Greek) Level*

4.2.1 EPEAEK I ⁷

At the beginning of this period Greek universities apart from the attendance in European evaluation programmes, they also took part in national evaluations through the Energy “Assessment of Higher education Institutions” that had been financed by the 1st Operational Program of Education and Initial Training (EPEAEK I). Due to this Energy evaluations of Universities and Technological Educational Institutes (TEI) were financed and realized during the years 1998-99. These evaluations were at both Institution and Department level. The main objective was the assessment of both the educational activities in HEI and TEI and the provided services by them. Totally 12 proposals of Institution evaluation and 73 proposals of Department evaluation were approved. Consequently, during these two years evaluations took place in 14 out of then 18 HEI and 11 out of 14 TEI (Kladis, 2000).

4.2.2 EPEAEK II

In 2000 started in cooperation with the 3rd Framework Programme (2000-06) the Greek Operational Programme, EPEAEK II, which was signed in Athens on 29 March 2001. At the presentation of EPEAEK II it was reported that: “*the priorities and measures that are developed, are found in affinity with the wider policy of growth of human resources, the National Action Plan for the employment, the National education policy and the direction lines of European Union*” (MoE, 2001).

By the previous experiences in Greek education system it appeared that there are some necessary prerequisites for the establishment and implementation of an evaluation system in higher education. A quality culture should have been developed inside and outside universities. Also, infrastructures should have been placed so that the MoE would be able to use the scientific and political mechanisms in order to allocate the essential elements for the quality assurance as well as the suitable structures for the future planning of higher education institutions (MoE- Special Management Service of EPEAEK, 2002).

4.2.3 Draft Law 2003 for a National System of Quality Assurance and Evaluation of HEI

At the same time, as it has already been shown, important developments in quality assurance were taking place at European level. This put extra pressure at national level for the establishment of a quality assurance law in Greek higher education system.

Therefore, the MoE had prepared a complete Draft-Law for the enactment of a quality assurance system. This Draft Law had determined that a National Council for Quality Assurance and Assessment (ESDAP) would have the responsibility and implementation of this system (Moe - Draft Law, 2003). However, this Draft-Law was not promoted in the Parliament to discussion during the period until the next national elections, in which the governing party lost and the neo-liberal conservative party of New Democracy (ND) returned in country's governance. It is very likely that this happened because MoE knew that it would meet difficulties and would cause reactions⁸ and intensities in actors mainly inside the Greek university.

4.2.4 Law 3374/2005

The new leadership of MoE began a new circle of consultations for the establishment of quality assurance system, since, Greece as a member of Bologna process, had already undertaken the commitment to enact a national quality assurance system up to the next meeting of Bergen in spring 2005. The public discussions however, were again very intense⁹ and the official dialogue was inevitably contrasting, especially during spring 2005 when the draft-law was published for further social consultation. The law was finally voted in July (Law 3374/2005).

⁷ EPEAEK I (1994-1999): The Greek “Operational Programme for Education and Initial Vocational Training”. This programme was operated inside the frame of the 2nd Framework Programme of the European Community.

⁸ Indicatively few papers of that period can be reported. These texts were written with the occasion of the public dialogue about the specific draft-law and reflections, questions, arguments and intense criticism have been developed: Prokou (2003), Theotokas (2003), Apekis (2003), Mplironikolaki (2003), Strevina (2003).

⁹ A collection of relative articles from Greek daily newspapers can be reported: Theotokas (2005), Venieris (2005), Koumantos (2005), Lavdas (2005), Markatos (2005), Milonakis (2005), Maistros (2005).

By the analysis of Parliament Proceedings it appeared that the government recognizes that the role of universities in the modern environment is complex because the widening of access and participation should be combined with reduction in public financing, international competition at educational services and the graduates' need for efficient entrance in job-market. The representatives of the conservative government (ND) also believed that through the implementation of an evaluation under the specific law and the resulted improvement of quality in higher education, the Greek university would become a place of "academic excellence, scientific vanguard, innovation and attractiveness". Beside excellence it was also reported the notion of social accountability of the university. In general the rationales presented by government representatives put forth the quality in university as "excellence" and "value for money"¹⁰ (Parliament Proceedings, 2005a, b).

The speakers of the majority opposition party (PASOK) supported the need for an institutionalized quality assurance system in Greek higher education since it is useful because: "*it is inalienable right of state, which in the name of taxed citizens provide financial resources to the public higher education institution, to evaluate efficiency*". Also by the reported proposals of different representatives of PASOK appeared to be in favour of a quality as "value for money" and as "fitness for purpose" (Parliament Proceedings, 2005a,b,c).

The representative of the minority (left wing) opposition party (SYN) supported that the Draft-Law in general "*has no relation nor with the quality of higher education neither, much more, with quality improvement and assurance*". According to his rationale the problems in higher education are already known and it is most likely that there is unanimity between actors and networks in Greek higher education so much for their existence, as long as for their hierarchy. During the discussion for the analysis of draft-law's articles the representative of the left-wing opposition party (SYN) supported notions of quality that adhered more to a concept of a "transformative" approach to quality, and therefore he believes that quality is not measurable. Consequently, through this rationale there is no meaning in enacting an institutionalized evaluation system (Parliament Proceedings, 2005a, b).

The representatives of Greek Communist Party (KKE) appear to espouse the belief that any form of quality assurance would connect universities with economic interests and finally lead to their degradation and their decomposition inside the frame of capitalism. More specifically, for the draft-law was stated that: "*in general [the law] tries to convert higher education in a body that will ensure a narrower dependence of university from economic, political or ideological needs of capital. Therefore, [the law] promotes the more effective control of universities by the capitalistic market*" (Parliament Proceedings, 2005a,b).

By this policy document analysis appears that generally the two big Greek political parties, with some differentiations, accept that a type of institutionalized evaluation should be implemented in universities. It has to be mentioned though that majority opposition party (PASOK) proposed many changes in the law which were in agreement with the main philosophy of draft-law 2003 with actualized positions due to so much the EU developments of what the E4 group report about quality assurance at the Bologna process in Berger. The two left political parties, with different arguments, were opposed to the specific law and to an institutionalized quality assurance system in Greek higher education.

The difficulty in the enactment of a quality assurance in Greek universities is, by analysis of Greek policy documents, well established. However, it is important to be pointed out the existence of difficulties in the implementation of quality assurance procedures after the voting of a law. Recent proof of this constitutes the referred difficulties and bureaucratic problems that ADIP (Hellenic Quality Assurance Agency for Higher Education) has met in the begging of its operation. As ADIP states in two different reports, these problems, many times, were not emanate by actors who were against to the philosophy, structures and implementation of the law, but from the political leadership and the government itself (ADIP, 2008, 1-4 and ADIP, 2009, 10-12).

¹⁰ Harvey and Green (1993) in their discussion of the relationship between quality and standards in higher education identify different aspects of quality: Quality as excellence, as fitness for purpose, as value for money, and as transformation. These different notions of quality obviously have different implications not only on the methods used to measure quality but also on the beliefs and values for the role of University in the modern society: Quality as excellence. This notion of quality underpins the elitist view of the high quality of an "Oxbridge" education, which equates it to excellence and high standards. (Harvey and Knight, 1996). Quality as fitness for purpose. This requires that a product or service fulfil customer's needs, requirements or desires. In a university's mission of statement its goals are clarified, and at a lower level these goals are defined in the programme's aims. In this notion of quality universities are required to say what they do, do what they say and then prove it to an external assessor. Quality as value for money. It is a popular notion for quality which equates quality with value for money. Since all public sectors ought to be accountable this notion gives the right to the state, the major financier of higher education, to demand for efficiency and effectiveness. Quality as transformation. In the context of quality in higher education transformation is not restricted to apparent of physical transformation but also to cognitive transcendence with the provider "doing something to the customer rather than just doing something for the customer" (Harvey and Green, 1993, 24).

5. Conclusions

Firstly, it appears that different administrations of Greek MoE have tried to enact and implement evaluation mechanisms in higher education that was closely connected with the related developments at European education policies. More concretely:

- The Law (2083/1992) established an evaluation mechanism of HEI with criteria that would have been decided by an independent committee. This external evaluation should have also taken into consideration the official planning of each HEI. At European level at that time the Memorandum for higher education 1991 had been preceded, and determined the improvement of the quality of European universities as an important horizontal action line. Moreover, in the conclusions of ministers of education meeting in 1991 the improvement and evaluation of quality in the European higher education was also reported as an action line for EU states-member with a prompt that they should follow methods that could be used and analysed in a future comparative study.
- The MoE besides the efforts of higher institutions' participation to national and international evaluations tried unsuccessfully to enact a Law (in 2003) for the quality assurance of Greek higher education. The draft-law determined that the evaluation processes were supposed to be started with the internal evaluation phase by Internal Institution Units of Quality Assurance, followed by an external evaluation of a group of experts (possibly with international attendance) and would accomplish with the final institutional evaluation report. Respectively, at EU level, the Recommendation 1998 has placed in the top of European education policy agenda the quality assurance and promoted not only the evaluation of universities at national level but also the cooperation between states-member giving an international dimension in the evaluation of European higher education systems. In the Bologna process the quality assurance also became one of the central action-lines. At the Prague communiqué in 2001 was clearly stated the engagement on narrower cooperation so much between higher education systems what in at European level with the cooperation of the independent national quality assurance agencies and national higher education systems with ENQA. The final objective was the configuration of common framework (with internal and external phases in evaluation) for the quality assurance in the European higher education.
- A quality assurance system in Greek higher education was established by the Law (3374/2005). One year before at EU level a Recommendation for the further cooperation in quality assurance of European higher education systems and the proposal for the establishment of EQAR had been announced. In the Bologna process at Bergen the ministers accepted the "ESG" report of E4 group. The proposed evaluation system by the Greek law is generally in line with the ESG report for both internal and external evaluation. It also establishes an independent agency (ADIP) having similar structural characteristics with the ESG guidelines.

Secondly, all the different efforts of enactment of an institutional evaluation mechanism in higher education gave birth to intense reactions during the phases of public dialogue upon each draft-law. And the result of these reactions was by no means negligible: The 24 article of law 2082/1993 was never been activated. Ten years later, although important developments in the European educational policies that promoted actions for quality assurance in higher education had been taken place, the draft-law in 2003 due to the intense reactions was never deposited in the Greek Parliament. Finally, Law 3374/2005 has difficulties and outstanding delays in its implementation during the years 2006-2008 as it is stated in ADIP's official reports for these years 2008 (ADIP, 2008 and 2009).

Thirdly, parallel with these difficulties many Greek higher institutions and/or Departments have decided to participate in national (EPEAEK I and II) or international (IEP by EUA) evaluation programmes. This argument is proved by the fact that in the period from 1993 up to today 93 international or national evaluations of higher institutions and Departments have been completed.

It is important, therefore someone to insists in this central contradiction of Greek case. On the one side, it appears that the State, irrespectively of the governmental schema, has exceptional difficulties of enacting and implementation a legislative framework for the institutional evaluation of higher education. On the other side, when the State prompts indirectly, without being a protagonist, the evaluation of Greek higher education by international programs or national not institutionalized procedures the picture if it is not reversed it changes substantially.

Therefore, it could be claimed that the hypothesis of this paper has been confirmed. The findings by the policy document analysis show that national (Greek) quality assurance policies are in agreement with European education policies. Also, it has been shown that although there are difficulties on implementation of an institutionalised quality assurance system, many Greek universities and/or

Departments in the last two decades have decided to undertake not institutionalized evaluation programmes.

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