

CENTRALISATION AND DECENTRALISATION IN HIGHER EDUCATION: A COMPARATIVE STUDY OF HUNGARY AND GERMANY

**Carla Liege Rodrigues Pimenta, Prof. Dr. Zoltán Rónay,
Prof. Dr. András Németh**

Eötvös Loránd University (Hungary)

Abstract. The main focus of this article is on comparing the centralisation and decentralisation in higher education in Hungary and Germany. This study explores trends in implementing quality assurance measures in higher education. It employs the methodology of document analysis to identify differences between the two nations in the level of autonomy they accord to higher education institutions in regulating quality assurance standards. Data collected from these documents demonstrate that the two countries have divergent approaches to higher education governance. In the Hungarian higher education system, management is centralised and monitored by the national government. This state control indicates limited autonomy amongst higher education institutions to organise academic programs. In contrast, the German legal documents examined in this study indicate a belief in the need to guarantee the quality of learning, teaching, research, academic freedom, gender equality, and institutional autonomy. The data collected reveal the close relationship between governance and quality assurance in discourses regarding the accountability, transparency, and freedom of stakeholders.

Keywords: quality assurance of higher education; governance and management; institutional autonomy; policy evaluation; comparative study

Introduction

The enactment of the quality assurance mechanisms and tools in higher education systems has been growing in the increasingly globalised world in various ways. Research has been conducted to describe the impact of the quality assurance agencies in creating the assessment procedures to evaluate the academic degrees and overall activities in the institutions and respond to the supranational demands such as European cooperation (Bornmann et al. 2006; Damian et al. 2015; Federkeil 2003; Leiber et al. 2015).

This study aims to explore the centralisation and decentralisation of higher education and trends and challenges in the implementation of quality assurance measures in higher education in Hungary and Germany. This investigation is designed according to the following research questions:

1) What is the scope for action of institutions in regulating quality assurance relying on legal documents? and

2) How does the regulation of institutional autonomy influence the quality assurance and the connection between these elements with the responsibility of the university administrators (e.g., people such as the university's rector or, chancellor)?

We can thus examine the effects of differing standards of institutional autonomy in the implementation of quality assurance measures, as well as consider differing beliefs about the connection between quality assurance elements and the responsibility of university administrators by evaluating official higher education documents.

The main purpose of selecting these countries is based on the common heritage of Humboldt-model that provides comprehensive knowledge about the development of the idea of the university (Backhaus 2015; Nybom 2003). This has been influenced by fundamental changes in the discourses of the quality and promoted reforms in the universities over time in both the European countries inspired by the social, political and economic demands. The German university model has been influencing profound changes in Hungary following the historical, political, economic, and educational fields. Regardless of the variances in geographic, political, and economic terms, both countries have currently undertaken parallel legislative reforms in their systems, making this comparison appropriate in the scope of higher education policies (Bray & Jiang 2014; Nóvoa & Yariv-Mashal 2003). Moreover, while they differ in landscape, objectives, and level of implementation, these legislations were implemented simultaneously, to improve the efficiency and quality of institutional activities, as well as promote the visibility and national competition under the European strains.

Main theoretical perspectives explaining quality assurance in the European context

Since the 1990s, quality assurance in European nations has become a vital parameter in the higher education institutions reforms (Alzafari & Ursin 2019). A number of studies have begun to define the quality assurance as concept fit for purpose, improvement of education, accountability, public information and market transparency, establishing detailed processes in teaching and learning through governance and/or management, planning strategies, increasing accountability, developing programs involving the stakeholders, accreditation, steering quality enhancement and transformation (Harvey 2007; Harvey & Green 1993;

Szanto 2004; Van Damme 2000; Vlăsceanu et al. 2004). Researchers attempted to evaluate the impact of transnational cooperation and the enactment at the national level across European countries (Hopbach & Serrano-Velarde 2007).

In this direction, for bringing sensibility to the context, the actors involved in the institutions across Europe brought a new perspective of building institutional autonomy on academic values and establish open decision-making platforms where stakeholders are required to participate and contribute to the quality assurance operations visible for accountability purposes and transparency. In connection with these principles, the relationship between governmental approaches (rational planning and control versus self-regulation) pays certain consideration to the role of the state and independent agencies in assuring sustainable practices and achievement of the institution's mission, consequently promoting the quality of education (Damian et al. 2015; Gornitzka 1999; Hopbach 2006).

Policies orientation towards a robust European quality assurance framework

In 1999, the Bologna Declaration supported a change in higher education across Europe and beyond, which proposed European cooperation in establishing equivalent methods and standards. Quality assurance started to occupy a central place in higher education policy, offering an indispensable aspect for any system of easily transferable, understandable and equivalent degrees, as well as a measure of Europe's attractiveness and competitiveness in the world.

Since Bergen 2005, the European institutions have relied upon a document with a set of standards in the European Higher Education Area (EHEA) that underpinned the development of quality assurance. The 'Standards and guidelines for quality assurance in the European Higher Education Area' (ESG) were approved by the ministers in charge for higher education in 2005, following a proposal dealing with a specific policy from European Association for Quality Assurance in Higher Education (ENQA) along with the Bologna Declaration subscribers¹⁾.

This document was a proposal in collaboration with the European Students' Union, the European Association of Institutions in Higher Education, and the European University Association. The ESG reinforced a series of procedures, criteria, and guiding plans for the quality assurance of higher education. It called for systematic monitoring of quality assurance guidelines, both internal and external.

The working methods used to establish the European policy consisted of 'Open method coordination' (OMC) which introduced an intergovernmental policy-making method that does not result in legally binding legislative procedures within the EU and does not require European countries to announce legislative requirements or amendments to existing provisions. This so-called 'soft law' is focused on the networks at the community level, integrating public and private experts in the field of Education (Mikulec 2017).

In 2007, continuing this path of European influences, the London Statement asserted the importance of responding successfully to the challenges of globalisation and was quoted saying “(...) we are developing an EHEA based on institutional autonomy, academic freedom, equal opportunities and democratic principles that will facilitate mobility, increase employability and strengthen Europe’s attractiveness and competitiveness”²⁾.

In 2015, the ESG document was revised which pointed to recent developments at the EU level in the endeavours of establishing cross- border external quality assurance, automatic recognition of academic degrees, European method for quality assurance of joint programs. It also underlined the institutional responsibility for the quality and emphasising student-centred learning and improvement in the teaching and assessment.

These policies contributed to the elaboration of strategies and planned actions for higher education that tried to promote necessary adaptations to this changing context. These strategies are primarily focused on the expansion of the European higher education system, along with the Bologna Process and the search for quality characteristics (Kehm 2010).

Currently, the main challenge of the enactment of quality assurance across the national European countries is its operation within a multifaceted and varied framework. Some countries demand an internal quality culture based on best practices to be implemented by institutions. Others require an external evaluation and direct monitoring by agencies aiming to promote continuous quality improvements (Orsingher 2006). However, the ESG was revised, thus proposing provisions on the internal evaluation changes in the agencies after considering it as a core for enhancing management and practices in between and within the institutions.

We have considered the implications of these supranational policies for higher education at the national level (Afonso 2001; Hopbach & Serrano-Velarde 2007). We assumed that the analysis of these policies in higher education would allow us to reflect critically on how they are being implemented and how they are congruent with institutions and the stakeholders involved. In this research, we focus our critical analysis on knowing where quality assurance has been situated/orientated in the countries selected. The attempt of this paper focuses on the governmental regulation concerning the quality assurance in higher education and their impacts on the institution’s practices/strategies based on the assumptions that are embedded by the national standards and/or the institution traditions as dominant discourses (Alzafari & Ursin 2019).

Methods

We employed the quality approach through the document analysis to identify differences between the two nations in the level of autonomy they accord to

higher education institutions in regulating QA standards by evaluation the policy higher education. The contents analysis was supported by Nvivo 11 (Creswell & Creswell 2017).

The comparative method selected for this research places an important part on comprehending the context of the educational policies for the quality assurance developments and their enactment in Hungary and Germany on the HE systems, many of which of these discourses are embedded in the contemporary context of the globalisation. (Nóvoa & Yariv-Mashal 2003).

Data Collection

For this research, policy document analysis allowed us to search for similarities and differences between the subject countries by employing a comparative perspective concerning the current quality assurance policies implemented in Germany and Hungary. The documents selected were the Bavarian University Act (BayHSchG) from 23 May 2006; Law on Universities in the state of Berlin (Berlin University Law – BerlHG) as amended on 26 July 2011; Law on Universities in Baden-Württemberg (State University Law – LHG) of 1 January 2005; and the Hungarian higher education act.

Table 1. Keyword frequency: Quality assurance

Documents	Quality assurance Frequency
Hungarian Higher Education Act	17
Law on Universities in Baden-Württemberg (state University Law - LHG) of 1 January 2005	48
Bavarian University Act (BayHSchG) from May 23, 2006	8
Law on Universities in the state of Berlin (Berlin University Law- BerlHG) as amended on 26 July 2011	24
Total	97

In Table 1, we have a visual overview of the quality assurance notion analysis enacted by the legal framework in each country. Examining the total frequencies led to the 97 references of the term “Quality assurance” across the documents examined, which gave a preliminary result that indicates the term is transversal and prevalent in the documents. It also allowed us to explore the pertinence of the topic given by the higher education policy documents, which will provide better insight once we expand after in-depth analysis. This was considered with content analysis in the next phases.

In the second phase of analysis, the dimensions and categories were selected prior to the analysis, followed by the guidance of literature scrutinised in this particular topic. It was divided into one dimension ‘quality assurance’ and three categories, namely, managing higher education and learning, teaching, and

research with subcategories of institutional autonomy and internal and external evaluation.

The code thematic represents the dimension of the analysis quality assurance and the discourses in EU standards during the establishment of the academic degrees.

Results

Quality assurance system: a different point of view

In the Hungarian higher education sector after the collapse of the Soviet Union, the issue of quality was threatened by the expansion of the higher education sector. It became a major issue and gained important space in the national policy agenda (Csizmadia et al. 2008; Kövesi et al. 2004). For this matter, in 1996, a body responsible for the evaluation of the programs and other scientific issues was created in Hungary called the Hungarian Accreditation Committee (HAC), which introduced quality assurance in the higher education system in Hungary. The external evaluation began with this national agency responsible for monitoring and giving suggestions to improve the quality of the programs of the higher education institutions and align them with international demands (Szanto 2004). In 2005, the case of the Hungarian higher education system changed with the so-called “modernisation agenda”. One year later, the new law launched the institutional framework for implementation of bachelor’s and master’s degree programs to be followed in higher education institutions alighted within the Bologna Process. The importance of quality becomes evident with the introduction of guidelines under the Bologna structure agreement (Alesi et al. 2007; Marcus 2014). In 2011, the current legal framework was launched to higher education, and quality assurance is perceived as an essential element to fulfil the supranational requirements covered by the supervision of the state:

(...) in cases involving the launch of a bachelor, master, or tertiary vocational programme (...) the higher education institution may propose an expert other than the one specified in paragraph (4), provided that it is a full member of the European Association for Quality Assurance in Higher Education. In such case, the educational authority shall invite the organisation (Act CCIV of 2011 on National Higher Education, Article 67, and Section 4b).

HAC is not the only central player in the achievement of educational program standards, recognising institutions and accreditation courses, but also the European association for quality assurance in higher education bodies mentioned it as a key element for quality management in Hungarian higher education institutions.

The German case displayed a different path in the organisation and structure of the quality assurance system. Between 1989 and 1990, Germany began to use quality assurance as a source of accreditation for higher education institutions and

their programs. In 2006, reforms started to be launched in agreement with national and federal states which freed the autonomy of the institutions in their activities and practices, mainly concerning creating the internal quality assurance strategies in connection with ESG (Hopbach 2006).

The German tradition in this field contributes to the robust legal framework of the three German states that shared a common vision of quality assurance. The Baden Württemberg higher education act of 2005 highlights the quality assurance concept and the important role of the institutions in creating their quality assurance internal systems in response to the framework of the Federal state. It states

(...) the details of structures, procedures, and quality criteria, including the procedure, the requirements, criteria, and standards of the evaluation (...) the number and composition of the evaluation bodies, regulate the universities by the act. The quality assurance concept includes an interim evaluation or other suitable measures to provide feedback on previous performance during the qualification period, as well as status advice before starting the evaluation (Law on Universities in Baden-Württemberg (State University Law - LHG) of 1 January 2005, Section 51 b).

At the institutional level, the federal states showed the commitment to guarantee the leadership of the higher education institutions plan and develop an internal quality assurance system.

During the national level evaluation, the definition of comparable quality standards is based on a decentralised accreditation system in which the accreditation processes are conducted by independent agencies, of a private nature. These Agencies provide an authorisation concerning the teaching, learning and other program matters where the German higher education institution can without restrictions indicate the agency they want for the certification of their courses, as long as the German Accreditation Council (GAC) recognises it.

One interesting point found in this federal-state higher education act was the indication of the creation of the commission for quality assurance of the Baden-Wuerttemberg Cooperative State University (DHBW). Overall, the quality assurance system is structured internally and externally in the German context. It is cognizant of the broad perspective about the regional or international principles of quality assurance which may have side effects on systems and the quality of the education (Hopbach 2006).

Managing higher education: centralised versus decentralised

As outlined above, within the current law of 2011, the Hungarian higher education institutions governance and the decision-making is conducted by the state, which transforms the higher education scenario. Foremost, the internal governance structures within the institutions changed with the enactment of the “Chancellor” role in the Hungarian higher education system. Chancellor represents a great power

in state higher education institutions management, while he/she is appointed by the government that implicates in the state intervention on the academic, financial, and management of the higher education institutions. This somewhat counterintuitive result decreases the rector's decision-making within the institution's practices, purposes, and organisational system.

In 2015, the Hungarian situation was more critical with the institutionalisation of the "Consistory" that contributes to the less autonomy of higher education institutions in their institutional development strategies, academic programs, research, and the financial matter (Rónay 2019b). For illustrative purposes, the excerpt below demonstrates the managing structure of higher education in Hungary:

At public higher education institutions, the chancellor shall be responsible for ensuring the operation of the institution. The chancellor shall be in charge of the economic, financial, controlling, internal audit, accounting, labour, legal, administrative, IT and asset management activities of the higher education institution, including technical, facility utilisation, operational, logistical, service provision, procurement and public procurement matters, and shall manage operation in this field. He shall also be responsible for the preparation of the necessary measures and proposals relating to management and the fields specified above, exercising in that context the right of consent, in matters not falling under the competence of the consistorian, to decisions and measures having economic consequences for the management, organisation and operation of the institution (Act CCIV of 2011 on National Higher Education, Article 13/A).

The appointment of the consistory, maintainer, and chancellor as higher education institutions governance bodies in this emergent scenario points out towards the stronger state control, and the decrease of the institutional management of the rectors and academics participated in the decision-making process. Two practical examples shed light on the restructuring institutions' status quo when the government has been regulating the academic, scientific, and functions of the higher education institutions. Firstly, the obliteration of Gender studies from Hungarian higher education programs. Secondly, the eradication of the Central European University from Hungary (Rónay 2019a). These examples may vindicate the centralised (top-down) approach to the policies and practices of the Hungarian higher education system. Nevertheless, in the case of the German education system, comprehensive transformation in the governance of universities started in the early 2000s following the reform and increasing freedom and autonomy of the institutions to choose the respective system of internal quality assurance and the instruments, strategies, and procedures to assure quality in their practices (teaching, learning, research, and management) (Serrano-Velarde 2008). The legislative documents analysed demonstrates that the federal states underline self-management and guarantee equal opportunities for all, regardless

of gender, special needs, and nationality. One common initiative found in the documents was the establishment of the Women representative office to promote gender equality:

Each university issues a statute in which, to achieve gender equality in terms of personnel, material, financial and content, it particularly stipulates the following areas: 1. Compatibility of studies, work and family; 2. Appointment procedure; 3. Promoting women's and gender studies; 4. The content and organisational structure of the education, training and further education of scientific and non-scientific staff; 5. Occupation of bodies and commissions; 6. Protecting university members from sexual harassment (Law on Universities in the State of Berlin (Berlin University Law- BerlHG) as amended on 26 July 2011, Section 5a).

The establishment of equal opportunities office and activities in the policy documents showed the direction in which the governance of the German federal states anchored their values and responsibilities, which to some extent distances itself from the Hungarian governance model.

The legal framework of the federal states in Germany, regarding the higher education structures unfold similarities in the restructuring of the institutions, knowledge production, and the role of the institutions in society. Essentially, the higher education bodies are composed of the rector/president, vice-rector, Senate, university council, and faculty dean. However, according to the data studied in the institution's plan, and activities are undertaken by the state supervision, the institutions should send reports and development plan to the Minister responsible, in order to convey public transparency thus sharing their financial investment, academic achievements and outcomes in an accountability manner during a certain period at the institutional level (Van Damme 2000).

Institutional autonomy and decision-making: Less or more?

The institutional autonomy is one key element which connects with the reforms in the sector, and the intervention of the state or not and may increase or decrease institutional leaders in the decision-making in the operations of the institutions (Karran et al., 2017). In the German higher education documents, the issue of institutional autonomy in budgetary, academic, and scientific matters enjoy great attention by their inclusion in legal acts. In other words, the higher education institutions of the federal states are flexible and independent and opt for the use of the curriculums, programs, and funds allocated by the state budget. The institutions and the stakeholders also have freedom in scientific, academic, research, and art:

(...) the internal freedom of science is adequately secured; in particular, academic self-government must have a significant influence on the appointment and dismissal of university management, and autonomous decision-making by academic bodies must be guaranteed in the academic

core area; The members of the university must be granted the right to participate in the design of the course following the principles of this law (Law on Universities in Baden-Württemberg (State University Law - LHG) of 1 January 2005, Section 70).

It is interesting to note that guarantees of the institutional autonomy and academic freedom underlined in the policies address the democratically compressive discourses and recognise the diverse universe of the higher education institutions. In the Hungarian case, no findings regarding institutional autonomy and academic freedom were shown. Conversely, it was shown how the government legitimated point of view regulatory tasks to strengthen the establishment and operation of the institutions under their guidance although, on the national higher education institutions act, it is mentioned that the maintainer appointed by the government will not affect the academic and financial affairs:

The maintainer shall exercise control without prejudice to the higher education institution's autonomy in matters such as the academic subject and content of education and research. Upon the decision of the senate of the higher education institution, the rector may seek a judicial remedy against the maintainer's decision within thirty days of the notification thereof, requesting the court to establish that the autonomy of the higher education institution, which is to be ensured pursuant to this Act, has been prejudiced by the maintainer's decision (Act CCIV of 2011 on National Higher Education, Article 75).

We have shown two examples of how the Hungarian government affects the academic and scientific matters when abolishing programs of the higher education system (Kováts 2015). Consequently, driving a strict regulation on the operations and financial matter that is contradictory to the Fundamental Law when stated:

(1) Hungary shall ensure the freedom of scientific research and artistic creation, the freedom of learning for the acquisition of the highest possible level of knowledge and, within the framework laid down in an Act, the freedom of teaching.

(2) The state shall have no right to decide on questions of scientific truth only scientists shall have the right to evaluate scientific research.

(3) Hungary shall protect the scientific and artistic freedom of the Hungarian Academy of Sciences and the Hungarian Academy of Arts. Higher education institutions shall be autonomous in terms of the content and the methods of research and teaching; their organisation shall be regulated by an Act. The government shall, within the framework of the Acts, lay down the rules governing the management of public institutes of higher education and shall supervise their management (The Fundamental Law of Hungary, 25 April 2011, Article X).

The quality assurance is not separable from scientific freedom, freedom of research and teaching methods and content. The institutional autonomy is a key element to be considered by the quality assurance systems. Thus, we can infer the distance between the principles of legal discourse and the real experiences in the Hungarian higher education context.

Internal and external evaluation: Accreditation and institutions strategies

Quality assurance requires more rigorous and comprehensive procedures, strategies, and values to assess the quality of studies, teaching, and research programs, both at the national and institutional levels. The tendency found in the analysed German legal acts was to consider the self-evaluation integrating the teachers, researchers, students, and all the actors involved in the institutionalisation of the quality assurance in the view of this 'soft law' to promote a community network (Mikulec 2017).

The university is developing a system to ensure the quality of their work and should provide external evaluations to carry out. Universities and external evaluation bodies may carry out the necessary surveys and other data processing to fulfil this task. (...) conducts the day-to-day operation of the university and is responsible for establishing principles for evaluation and quality assurance (Bavarian Higher Education Act (BayHSchG), 23 May 2006, Article 10).

However, in this subcategory, the Hungarian document only mentioned the accreditation evaluation of the courses and the role of the independent agency to evaluate the institution's programs and courses:

The HAC is an independent national expert body established for the purposes of the external evaluation of the quality of educational, academic, research and artistic activities performed in higher education and the internal quality assurance systems operated by higher education institutions, and the provision of expert services in the procedures related to higher education institutions, as provided for in this Act (Act CCIV of 2011 on National Higher Education, Article 70).

In this matter, the Hungarian quality assurance is regulated by the law, and this study recognised the implementation of the ESG in the Hungarian higher education system is under highly political control (Hopbach and Serrano-Velarde 2007). It is relevant to underline the internal and external quality assurance mechanisms and strategies that are an important aspect to boost educational activities, curriculum, research, and teaching practices. The importance of having agencies to evaluate academic affairs is to support the improvement of education (Van Damme 2000).

Enhance or decrease learning, teaching, and research?

The quality assurance policies translate the balanced relationship among the research, teaching, and learning and their constraints and challenges as principles

to improve and establish the quality culture in the higher education institutions. As mentioned before, both countries analysed in this research are European members and to be part of the community level, it was essential to reform the higher education sector, to 'catch-up' with this comparable market. One crucial aspect found in the document was the commonalities regarding the implementation of compatible and transferable curriculums within the EHEA credit system influenced by the Bologna Process in exchanging knowledge and creating networks (Mikulec 2017).

The bachelor and master studies should be structured according to the Bologna process agreement that can be organised in a two-cycle model, or single cycle extended programs. The Hungarian higher education law defines the organisation of the single-cycle long programmes according to the bachelor-master model" (Act CCIV of 2011 on National Higher Education, Article 3).

In general, these reforms in the higher education systems aimed to create the EHEA guidelines and standards in educational development, and the cooperation plays an essential role within European members to share innovation and creating a knowledge network in these dynamic national systems. A common aspect that is mentioned in all the legal documents is the partnership between the states, national and international institutions, not only between educational subjects but also within the business, non-academic institutions, and non-state actors.

The research is one key aspect to establish joint projects within the companies and the institutions. Considering that "Universities promote international cooperation, in particular, European cooperation in higher education, and exchanges between German and foreign universities (Bavarian Higher Education act" (BayHSchG), 23 May 2006, Article 2), this vision helps us to understand that the university serves as a gathering place for networking and association business agreements to exchange and share best practices to boost the quality of education in EHEA.

This study presented trends in the implementation of quality assurance measures in higher education in Hungary and Germany. Regardless of the substantial efforts taken to launch an EHEA development of what is often thought to be a part of the higher education market, the recognition of the external evaluation through the national agencies, the supremacy of national framework and discourses of orientation within the data stated above is prominent.

The research identified differences between the two nations in the level of autonomy they accord for higher education institutions in regulating quality assurance standards. By evaluating higher education documents, it showed the effects of differing standards of institutional autonomy on the implementation of quality assurance measures.

The scope for action of intuitions in regulating quality assurance through data collected from these legal documents demonstrates that the two countries have divergent approaches to higher education governance and/or management consequently affecting the decision-making in the operations of the institutions.

The reforms are mediated by different national realities where changing quality assurance parameters affects the status quo of university governance policies in these two nations. Mainly, this study indicates that in the Hungarian context, the changing role of universities illustrated that limited institutional autonomy and academic freedom obstruct the full performance/recognition of the higher education institutions.

Discussion

This study described the centralisation of higher education in the two countries in a comparative manner in various ways. Also presented some trends in the implementation of quality assurance measures in higher education in Hungary and Germany. Regardless of the substantial efforts taken to launch an EHEA development of what is often thought to be a part of the higher education market, the recognition of the external evaluation through the national agencies, the supremacy of national framework and discourses of orientation within the data stated above is prominent.

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A comparison of the policy documents leads to the conclusion that quality assurance systems, assessments mechanisms, and strategies depend on the ability of the national policies to advocate higher education institutions to engage in the culture of excellence, good practices, drive innovation and enhance outputs and to freely manage the transformation process in their operations and activities in an autonomous manner.

This study has identified similarities in both German and Hungarian quality assurance assuming that both countries implemented the Bologna process, governance, and management under the same supranational demands, to respond to the compatible recognition and international cooperation among the EHEA. Through these two European cases, direct concern about the positive/negative impact of higher education reforms on knowledge production that are oriented by a

centralised or decentralised approach (Gibbons et al. 1994). The policy documental analysis of the legal content contributed to vindicate relevance and the complexity of creating standards for the warranted quality, as well as outlooks power, governance, sustainability, and accountability.

In the Hungarian higher education system, governance is centrally regulated and monitored by the national government. This direct state control reflects a lack of organisational autonomy of higher education institutions to organise academic programs and its resources, as well as restricting the freedom of teachers, students, and researcher's freedom in their activities.

The Hungarian higher education framework is *sui generis* since the centralised management narrows the quality assurance framework that is subordinated to a strong national administration that affects the responsibility of the university administrators (e.g., people such as the university's rector or, chancellor). The Hungarian case is an unusual case compared to the German one.

In contrast, the German higher education system is decentralised, which allows the country's, constitutive states to determine how to implement quality assurance policies individually. The German legal documents examined in this study communicate a belief in the need to guarantee the quality of learning, teaching, research, academic freedom, gender equality, and institutional autonomy. However, we could perceive the lack of policy regimes in the national guidelines concerning quality assurance, which is difficult to establish a standardisation quality evaluation that allows comparing German higher education institutions nationwide (Federkeil 2003). The data collected in this study revealed the close relationship between governance and quality assurance in discourses regarding the accountability, market transparency, and personal freedom of the stakeholders.

NOTES

1. Communiqué, B. (2005). The European Higher Education Area—Achieving the Goals. Communiqué of the Conference of European Ministers Responsible for Higher Education, Bergen, 19 – 20 May 2005. Bergen, Norway. [Http://Www.Bologna-Bergen2005.No/Docs/00-Main_doc/050520_Bergen_Communique.Pdf](http://Www.Bologna-Bergen2005.No/Docs/00-Main_doc/050520_Bergen_Communique.Pdf).
2. Communiqué, L. (2007). Towards the European Higher Education Area: Responding to challenges in a globalised world.

REFERENCES

- Afonso, A. J., 2001. Reforma do Estado e políticas educacionais: Entre a crise do Estado-nação e a emergência da regulação supranacional. *Educação & Sociedade*, **22**(75), 15 – 32.

- Alesi, B., Rosznyai, C., & Szanto, T., 2007. The implementation of bachelor and master programmes in Hungary. *European Journal of Education*, **42**(3), 395 – 409.
- Alzafari, K., & Ursin, J., 2019. Implementation of quality assurance standards in European higher education: Does context matter? *Quality in Higher Education*, **25**(1), 58 – 75.
- Backhaus, J. G., 2015. *The university according to Humboldt: History, policy, and future possibilities*. Springer.
- Bornmann, L., Mittag, S., & Danie, H.-D., 2000). Quality assurance in higher education–meta-evaluation of multi-stage evaluation procedures in Germany. *Higher Education*, **52**(4), 687 – 709.
- Bray, M., & Jiang, K., 2014. Comparing systems. In: *Comparative education research*, 139 – 166. Springer.
- Csizmadia, T., Enders, J., & Westerheijden, D. F., 2008. Quality management in Hungarian higher education: Organisational responses to governmental policy. *Higher Education*, **56**(4), 439 – 455.
- Damian, R., Grifoll, J., & Rigbers, A., 2015. On the role of impact evaluation of quality assurance from the strategic perspective of quality assurance agencies in the European higher education area. *Quality in Higher Education*, **21**(3), 251 – 269.
- Federkeil, G., 2003. The Lack of a National Policy Regime of Quality Assurance in Germany – Implications and Alternatives. *Higher Education Management and Policy*, **15**(2), 63 – 71.
- Gibbons, M., Limoges, C., Nowotny, H., Schwartzman, S., Scott, P. & Trow, M., 1994. *The new Production of Knowledge. The Dynamics of Science and Research in Contemporary Societies*. Sage.
- Gornitzka, Å., 1999. Governmental policies and organisational change in higher education. *Higher Education*, **38**(1), 5 – 31.
- Harvey, L., 2007. Epistemology of quality. *Perspectives in Education*, **25**(3), 1 – 13.
- Harvey, L. & Green, D. (1993). Defining quality. *Assessment & Evaluation in Higher Education*, **18**(1), 9 – 34.
- Hopbach, A. & Serrano-Velarde, K., 2007. *From Transnational Co-operation to National implementation*. **15**, 16.
- Hopbach, Ach., 2006. The European Standards and Guidelines and the evaluation of agencies in Germany. *Quality in Higher Education*, **12**(3), 235 – 242.
- Karran, T., Beiter, K. & Appiagyei-Atua, K., 2017. Measuring academic freedom in Europe: A criterion referenced approach. *Policy Reviews in Higher Education*, **1**(2), 209 – 239.

- Kehm, B. M., 2010. Quality in European higher education: The influence of the Bologna Process. *Change: The Magazine of Higher Learning*, **42**(3), 40 – 46.
- Kováts, G., 2015. *Recent developments in the autonomy and governance of higher education institutions in Hungary: The introduction of the chancellor system.*
- Kövesi, J., Szabo, T. & Bota, G., 2004. Quality evaluation of the Hungarian higher education based on the opinion of the ‘customers’: An application at Budapest University of Technology and Economics. *European Journal of Engineering Education*, **29**(3), 389 – 399.
- Leiber, T., Stensaker, B. & Harvey, L., 2015. Impact evaluation of quality assurance in higher education: Methodology and causal designs. *Quality in Higher Education*, **21**(3), 288 – 311.
- Marcus, J., 2014. The erratic path of Hungarian higher education. *Change: The Magazine of Higher Learning*, **46**(3), 37 – 44.
- Mikulec, B., 2017. Impact of the Europeanisation of education: Qualifications frameworks in Europe. *European Educational Research Journal*, **16**(4), 455 – 473.
- Nóvoa, A. & Yariv-Mashal, T., 2003. Comparative research in education: A mode of governance or a historical journey? *Comparative Education*, **39**(4), 423 – 438.
- Nybom, T., 2003. The Humboldt legacy: Reflections on the past, present, and future of the European university. *Higher Education Policy*, **16**(2), 141 – 159.
- Orsingher, C., 2006. *Assessing quality in European higher education institutions.* Springer.
- Rónay, Z., 2019a. Academic Freedom and Strong State Control: Two Samples to Illustrate the Consequences. *Bulgarian Comparative Education Society.*
- Rónay, Z., 2019b. Consistory – the obscure subject of state control. In: *In Gergely, Kováts; Zoltán, Rónay (Eds.) In search of excellence in higher education* (pp. 71 – 87). Corvinus University of Budapest Digital Press.
- Serrano-Velarde, K. E., 2008. Quality assurance in the European higher education area. *Higher Education Management and Policy*, **20**(3), 1 – 18.
- Szanto, T. R., 2004. Programme Accreditation in Hungary: Lessons from the past, plans for the future. *Quality in Higher Education*, **10**(1), 59 – 64.
- Van Damme, D., 2000. Internationalisation and quality assurance: Towards worldwide accreditation? *European Journal for Education Law and Policy*, **4**(1), 1.

Vlăsceanu, L., Grünberg, L. & Pârlea, D., 2004. *Quality assurance and accreditation: A glossary of basic terms and definitions*. Bucharest: Unesco-Cepes Bucharest.

✉ **Carla Liege Rodrigues Pimenta, PhD student**

ORCID ID: 0000-0002-2051-5672

Prof. Dr. Zoltán Rónay

ORCID ID: 0000-0002-2051-5672

Prof. Dr. András Németh

ORCID ID: 0000-0001-9770-9830

Eötvös Loránd University

Budapest, Hungary

E-mail: carla12@student.elte.hu

E-mail: ronay.zoltan@ppk.elte.hu

E-mail: nemeth.andras@ppk.elte.hu