Challenges in Regulating Quality Assurance in Higher Education in Small States:
A Case Study of the Maldives

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Abstract

This paper presents findings of a case study of the regulatory framework of quality assurance (QA) in higher education in the Maldives. For this study, a systems approach was adopted to capture a holistic perspective of the various key elements and their relationships to each other to investigate the effectiveness of the regulatory framework in the quality assurance system. The data collection consisted of document analysis and interviews with four key stakeholder groups. Some of the unique challenges in developing and establishing a fully-functioning regulatory mechanism of quality assurance for higher education in the Maldives include lack of independence of the system from the Ministry of Education and influence of other key stakeholders on the decision making process of the quality assurance system. Absence of a legal mandate to ensure that outcomes of regulatory processes are accepted by the government, the public and the higher education system is unique to the Maldives where the quality assurance system has been in operation since 2010, while it holds no legal status or independence. Whilst the case study is situated in the Maldives, it provides a useful reference for policy makers, practitioners and professionals in other small states.

Keywords: higher education in the Maldives, quality assurance, small state, regulatory practices

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1. Introduction

Harvey and Green (1993) in one of the most cited articles on quality in higher education identified five interrelated elements of quality: (1) quality as exceptional, (2) quality as perfection or consistency, (3) quality as transformation, (4) quality as value for money, and (5) quality as fitness for purpose. This study considered quality as 'fitness for purpose', within specific socio-political and economic contexts in which higher education institutions operate.

The Maldives, which is one of two small states in South Asia (United Nations, 1994), was the context for this study. Quality assurance of higher education in the context of small states - which are characterised by populations of 1.5 million or less, with limited physical capacity and immediate capabilities (United Nations, 1994) has distinct concerns from other larger countries. Higher education institutions in small states are expected to meet societal demands and contribute to local and national development goals against a backdrop of a highly competitive transnational, regional, and global higher education market, training graduates for a global workforce.

Quality assurance in higher education operates as a means by which governments monitor how higher education institutions are governed, funded and allocated students. The word governance comes from Greek verb "kybernian", which means to steer a ship in a certain direction (Campbell & Karayannis, 2012). Thus, it can be said that quality assurance systems enable governments to steer the direction and quality of higher education from a distance while demanding accountability for the funds allocated by the government, and transparency of higher education institutions.

Quality assurance is one of the key concerns in higher education in almost all small states (World Bank & Commonwealth Secretariat, 2000; United Nations Educational, Scientific and Cultural Organisation [UNESCO], 2011). It is often seen that small states adopt compromised versions of models of some developed nations, ending up with band-aid solutions (Houston & Maniku, 2005), which do not sufficiently provide the sustainability to support national needs and aspirations. This raises concerns about the 'fit' of those quality assurance regulations and procedures to the local, social and economic environments of the small states.

Higher education quality assurance systems around the world mainly consist of three main elements: regulatory framework, standards, and service delivery. Whilst acknowledging that standards and service delivery with functions such as accreditation and academic audit are equally important aspects of quality assurance (Waheed & Pillay, 2012), this paper is focused on the regulatory framework of the quality assurance system of the Maldives. When we look at the various higher education quality assurance systems around the world including small

states, regulation of the higher education quality assurance system is vital for the functioning of the whole national system as the roles and responsibilities of key people as well as functions of the national body for higher education quality assurance is outlined and specified in the regulatory documents such as legislations and in the Maldives, the mandate.

2. History of Higher Education Quality Assurance in the Maldives

In 1998, Maldivian government brought together several state operated post-secondary education institutions under one umbrella organisation called Maldives College of Higher Education. To ensure coherence in course design and accreditation across these different institutions working as a single college, the government introduced a quality assurance system in August 2000, similar to international developments in higher education at the time (Waheed, 2005). The Maldives Accreditation Board (MAB), a non-statutory government body, was created in August 2000 by presidential decree followed by the introduction of the first Maldives National Qualifications Framework in 2001

There is no specific ministry for higher education in the Maldives except for a brief period (along with some other functions) from 2006 – 2008. After the Ministry of Higher Education, Employment and Social Security was abolished, the function of management of higher education was again shifted to Ministry of Education in November 2008 under a newly created department called Department of Higher Education (DHE). Department of Higher Education manages registration of higher education institutions and decides the level of programs a higher education institution can deliver. Higher Education Council which is within the President's Office advises Department of Higher Education on policy and higher education reform. The Council's secretariat and proceedings are managed by the Department of Higher Education. DHE is also responsible for awarding scholarships and loans to students for higher education.

Due to expansion of types of higher education provision and increase of higher education providers, Maldives Accreditation Board was replaced by the Maldives Qualifications Authority (MQA) in 2010, with a renewed focus on quality assurance (Maldives Qualifications Authority, 2010). Maldives Qualifications Authority's activities with higher education institutions include programme approval (Maldives Qualifications Authority, 2017 a), programme accreditation (Maldives Qualifications Authority, 2017 b), and ongoing monitoring through institutional audits (Maldives Qualifications Authority, 2017c). Thus, through the creation of a quality assurance system, the Maldives government has been able to maintain direct control over the structure of higher education in the Maldives.

Contemporary higher education sector in the Maldives consist of about 90 providers of post-

secondary education, including further education and training providers who provide MQA approved local courses. Major players in the higher education field are less than 20 with two state funded government universities; three state funded specialist government colleges; and eight private colleges (Maldives Qualifications Authority, 2018).

A small number of Maldivians study overseas, especially in Sri Lanka, India and Malaysia. Maldives Qualification Authority plays a central role in recognition and assessment of their qualifications to ensure they meet the standards and criteria set by the Maldives National Qualifications Framework.

3. Literature Review

This section presents literature review on the issues related to governance and regulation of higher education quality assurance. The issues discussed are: importance of regulation, underlying principles, autonomy of the regulatory agency, one-tier system including the whole post-secondary education sector, and operational procedures.

Quality assurance in higher education was unknown till the early 1990s but is now widespread, spanning almost all the countries worldwide (INQAAHE, 2013). While some quality assurance agencies which work independently of governments are emerging, most of the quality assurance systems are introduced and put in place by governments to regulate the quality of higher education. With rapid increases in enrolment of young people in higher education, higher education qualifications have become a lucrative, tradable commodity in the international market and are linked to the economic competitiveness of nations (Rizvi & Lingard, 2009). Hence, quality assurance mechanisms are put into place given the reason that higher education is a "considerable expense for students in terms of money, time and opportunity cost, society needs a warranty that the degree meets some basic standards" (Beerkens, 2015, p.2). Hence, government regulation is used to protect consumers of an experience based product in a context where it is difficult to estimate the quality of the product.

Higher education regulation also fulfils a societal function of meeting national goals and aspirations for development by ensuring standards are maintained to expected levels of high quality. With universal secondary education, enrolments in higher education institutions are expected to increase, bringing a diverse student population with varying quality of education at entry points. Thus, it is in the interests of politicians to demonstrate to the public that there is tough control and regulation of higher education to ensure quality of provision, comparable to other nations' higher education institutions (Beerkens, 2015; UNESCO, 2011).

In the modern model of public sector management (McCourt, 2013); policy implementation, control and regulation is often transferred to an organisation that is separate from the government ministry which forms policies. It is believed that by separating politics from administration, the organisation can become more credible in the public eye and can support enforcement of the agreed standards more effectively (Bradley, Noonan, Nugent & Scales, 2008; Lægreid & Verhoest, 2010). However, since higher education sector has very close links with each other through shared expertise, career mobility, common interactions and shared history, this can cause accountability challenges. Furthermore, a strong institution can have its own identity and strategic interests, which can interfere with the public interests for accountability and transparency. Since the onus for accountability ultimately lies with the ministry responsible for higher education from the public point of view (Beerkens, 2015), legislation is used to ensure compliance to the outcomes of regulatory practices of the organisation (European Association for Quality Assurance in Higher Education [ENQA], 2015).

Despite concerns of giving all power of quality assurance to one agency, independence of the quality assurance body is a widely advocated principle in today's quality assurance regulatory circle (Ala-Vähälä & Saarinen, 2010; Bradley et al., 2008; Harman, 1998; Van Vught & Westerheijden, 1994). It is also heavily promoted in the European Association for Quality Assurance in Higher Education standards (ENQA, 2015). The underlying concept in the principle of independence of the regulatory body is to maintain objectivity of the quality assurance process by keeping the body free from influence of ministries, higher education institutions or other stakeholders (Billing, 2004; ENQA, 2015). Independence from stakeholders in its operations is also meant to ensure that the conclusions and recommendations made by the organisation cannot be influenced by key stakeholders, nor can the ministry or politicians influence the outcomes of quality assurance processes or the nomination and appointment of experts to the quality assurance body (ENQA, 2015). There is some evidence that in having a separate body, the government can use pressure on the quality assurance agency to maintain standards of higher education more effectively since the agency concentrates its efforts in one area, which the government with its short term policies cannot effectively maintain (Ewell, 2008). The level of autonomy experienced by different quality assurance bodies in different countries vary, with some more closely associated with university associations and where staff are not always civil servants, while others are semi-independent and formally autonomous in their operations though controlled by ministerial power (Beerkens, 2015).

Most quality assurance models around the world have largely been based on the conceptions of quality assurance that originated in North West Europe and the USA (Harvey & Williams, 2010). Though there are standard features apparent in many quality assurance systems, they are not homogenous in how they operate (Lewis, 2009). The explanation of these differences by Lewis (2009) is related to external quality assurance. Firstly, there are differences in the scope of the

evaluation and accreditation process as some agencies undertake it at institutional level, others only at the program level, while the majority do both. Secondly, there are differences about whether institutional audit reports are published and made public. Thirdly, there are variations in the freedom higher education institutions have in completing self-evaluations. Lastly, there are differences in the way site visits for monitoring quality assurance processes are conducted. It seems that the underlying principles for these variations are linked to the way quality and quality assurance is perceived; the degree of belief that quality assurance is an accountability mechanism through which both the quality assurance agencies and the institutions are more accountable to the public; the size of the national higher education sector; and the relationship between the quality assurance agencies and institutions. These reasons are also relevant to small states, while caution must be exercised when considering quality assurance mechanisms which are developed in different contexts and applied elsewhere.

Small states such as Samoa and Mauritius have made efforts to strengthen national higher education quality assurance systems that are fit for purpose by making legislative arrangements. In the case of Samoa, Samoa Qualifications Authority was created with an Act of parliament (SQA, 2018). In Mauritius, Mauritius Qualifications Authority was created also with an Act (MQA, 2018). Both are small states and their higher education quality assurance agencies are set-up with processes of quality assurance with accreditation and audit as well as other related functions- in the case of Mauritius, notably, qualifications recognition.

Having a single, strong national agency for higher education quality assurance means having an integrated system where all the elements of the quality assurance are clearly linked and are actively performing their roles. King (2007) notes that in order to promote greater consistency and efficiency, and as a response to growing pressure on higher education quality assurance regulatory systems worldwide, a single one-tier system for all postsecondary provision, may be the way forward. A review of the Portuguese quality assurance systems carried out by the European Association for Quality Assurance in Higher Education (ENQA) identified key characteristics of such a strong national quality assurance body (ENQA, 2006). Two characteristics highlighted in the ENQA review are to be a one-tier system as well as to be independent of government and higher education institutions. Other features recommended in the ENQA review are that the agency should be responsible for accreditation and institutional audit process; there should be a small independent government appointed board with members appointed in their personal capacity; the board should be vested with the authority to make accreditation decisions; the membership of the board should reflect established professionalism in overseeing quality assurance processes; and the board should be supplemented by an advisory council with representatives of relevant stakeholders, to ensure a wider involvement of relevant stakeholders in quality assurance. The advisory council can alleviate the concern that "regulatory capture" (Baldwin, Cave & Lodge, 2011) serves the interests of the regulating

authority rather than the public interest (Beerkens, 2015). From a small state higher education institution's perspective, some institutions, especially those working in rural, hard to access, poor communities serving underprivileged students may struggle to have the resources for compliance with quality assurance agencies' expectations. Thus, wider involvement of relevant stakeholders can ensure higher education serves the needs of communities and interest groups and available resources (Bogue, 1998, Bathmaker, 2015).

The criteria and guidelines used by a quality assurance agency is so vital for its operations in the sense that if these criteria and standards used to determine good quality are unknown, its practices may be controversial and disputed (Blackmur, 2008). That is why it is important to pre-define, publish and disseminate the processes, criteria and procedures of the functions of the agencies (ENQA, 2015). Though, areas needed for development of guidelines can vary according to the mandate of the quality assurance agencies. The areas of operation that are commonly seen in many higher education quality assurance systems as noted by Standards and Guidelines for Quality Assurance in the European Higher Education Area are: self-assessment, external assessment, publication of a report, and follow-up procedures to review actions of the institutions after the report (ENQA, 2015). ENQA (2015) advises that when quality assurance is "carried out professionally, consistently and transparently" (p.18) this will ensure its acceptance and impact.

ENQA (2015) highlighted four principles on which European agencies for quality assurance are formulated. Quality assurance should take into account the needs of all stakeholders and society, recognising the diversity of higher education systems, institutions, programs and students. Whilst higher education institutions are ultimately responsible for the quality of provision, the agencies should work collaboratively with stakeholders to support the development of a quality culture.

4. Methodology

This study adopted a qualitative approach and more specially a case study methodology. Given the limited theorising of quality assurance concepts and processes in the context of the Maldives, employing a qualitative design allowed the researcher to gain in-depth understanding of regulatory mechanisms of higher education quality assurance in the Maldives and what it means from the perspective of those who are involved in the process that may apply to other small states as well. Through a qualitative case study approach, this study focused on understanding the processes of quality assurance regulatory mechanisms in higher education from the perspective of a small state.

The data were collected from two different sources, using two different data collection procedures. The first source was from government documents which were subjected to content analysis. This involved reviewing government documents related to quality assurance in higher education such as the legislations, the institutional and organizational systems. It helped probe deep into current government policies and procedures and at the same time provided a basis for developing some of the interview questions. The second source of the data was through interviews with key stakeholders. The interviewees were selected among senior officials from four main stakeholder groups of higher education quality assurance in the Maldives: Ministry of Education (MoE), the Maldives Qualifications Authority (MQA), eight leading higher education institutions (HEIs) and five leading industry associations. Interview data was analysed using NVivo software.

The data analysis of this study was guided by the analytical principles of case study research proposed by Creswell (2003), which involves "a detailed description of the setting or individuals, followed by analysis of the data for themes or issues" (p. 191). The analysis for themes and issues were achieved through summative content analysis approach.

5. Results and Discussion

Themes that can be categorised under the element of regulatory framework which emerged from the data are legislation, governance and the organisational structure. These themes constitute attributes of the regulatory mechanism in quality assurance as outlined in the literature review. The following is a discussion of these findings.

5.1 Legislation

An analysis of the government documents confirmed that Maldives did not have a National Education Law. In the Maldives, the practice is to govern by what is called 'department mandate', in which only the functions of the Maldives Qualifications Authority are explained. However, in today's global quality assurance circles, the need for national education legislation for the purpose of quality assurance is acknowledged (Keevy et al., 2008; ENQA, 2015). According to Manyaga (2008), clearly described policies and procedures are vital for establishing structured quality systems. Similarly, there is a strong consensus among the stakeholders on having a clear legislative arrangement in line with world-wide best practices.

With regards to progress on adopting a legal framework to support the enforcement of a quality assurance framework through legislation, the Maldives Qualifications Authority pointed out that there was some progress being made to introduce a legal framework for higher education quality assurance. However, the progress referred to was merely a reference to a draft education

act; not really about any progress regarding a legislation for MQA. The support for legislation by the higher education institutions stakeholder group was high and they argued that it may help moderate external influence on the quality assurance decision making process. An interesting difference from a study reported by Stella (2010) of quality assurance in small states for The International Network for Quality Assurance Agencies in Higher Education (INQAAHE) and the Maldives situation is in the stage of the slow progression. According to INQAAHE study, the slow progression of the higher education quality assurance system is between the passing of legislation and the quality assurance agency/ unit becoming operational (Stella, 2010). However, this is not the case in the Maldives. In the Maldives, the slow progression is between setting up a quality assurance agency in 2001 and passing of legislation.

In the discussion of a legal act, the contents of such an act are crucial, because that will have an impact over the whole quality assurance system. The data analysis indicated that in spite of all stakeholders agreeing on the importance of legislation they did not discuss about what should be included in such legislation and the process for the introduction of legislation. Different countries may give priority to different sets of functions to be part of quality assurance agency legislation. Some countries empower their quality assurance agency by several legislations without a dedicated act of parliament as in New Zealand and South Africa. For example, in the case of New Zealand, the New Zealand Qualifications Authority (NZQA) is empowered by section 256A of the Education Act 1989 and also operates by some provisions of The Education Amendment Act (2011) and The Industry Training Act (1989) (New Zealand Qualifications Authority, 2012). In South Africa, the South African Qualifications Authority (SAQA) was initially created by the SAQA Act in 1995. However, it was replaced by the National Qualifications Framework (NQF) Act in 2008 and six other related acts have provisions related to SAQA (South African Qualifications Authority, 2012). On the other hand, as discussed in the literature review, some countries have enacted specific laws for their respective quality assurance agencies as in Australia, Seychelles, Malaysia, Samoa, and a number of other countries.

Figure 1 illustrates the core areas to be included in legislation for a higher education quality assurance agency for a small state context such as the Maldives. These areas are identified based on a World Bank report on the higher education in the Maldives (The World Bank, 2012) and the current mandate of the Maldives Qualifications Authority which were part of document analysis, and the legislations in Australia and Malaysia (Office of Legislative Drafting and Publishing, 2011; Parliament of Malaysia, 2007). These core areas are consistent across many well-established HE QA systems such as South Africa, Australia, New Zealand, Malaysia, etc.

Figure 1: Core areas of legislation

Figure 1 shows how the legislation is linked to the other two elements of standards and service delivery in the quality assurance system. It is legislation that gives clarity to all the three elements: regulatory framework, minimum quality standards and service delivery.

5.2 Governance and Organisational Structure

The supporting management and governance issues play a vital role in shaping up the system of higher education quality assurance. While governance is an attribute under the element regulatory framework, four sub-attributes emerged from data. They are: (1) Autonomy, (2) Representativeness of the Maldives Qualifications Authority Board, (3) Conflict of interest, and (4) Transparency. Each of these sub-attributes will be discussed below.

5.2.1 Autonomy – operational/ finance
Stakeholders used the terms "autonomy" and "independence" interchangeably to discuss the importance of unbiased decision making by the quality assurance agency which they believed can happen only if the agency is independent of government or other third party influences. Linked with autonomy of operations is the belief of one strong national regulatory body that is

responsible for all types of post-secondary education- a one tier system. Independence of the national quality assurance agency is widely promoted in quality assurance forums (Ala-Vähälä & Saarinen, 2010; Bradley et al., 2008; ENQA, 2015; Harman, 1998; Van Vught & Westerheijden, 1994).

Related to the independence of the quality assurance agency is the external influence on the agency. If the quality assurance agency is independent, then how is the stakeholder groups represented? While it may be independent, the membership biases can influence decision making. There are two major reasons why it is implied in this study that independence of the quality assurance agency leads to the agency to be a single one-tier system (ENQA, 2006). The first reason for independence is for the agency to have the authority to make accreditation and institutional audit decisions of all higher education institutions. This is so that academic fraud and criminal behaviour by local institutions can be minimised while maintaining quality assurance for all institutions. This cannot be achieved without independence from political pressures and third party influences. The second reason is that a feature of a strong quality assurance agency, to be independent of government, higher education institutions and other parties, is to have an independent board to regulate and govern the agency (ENQA). This is also how the data in this study indicated the nature of independence of a higher education quality assurance agency. There was strong conviction that one strong agency is the way forward for a small state like the Maldives. Currently, it appears there is a shift on the opposite direction in the case of the Maldives, especially with the creation of another body called "Quality Assurance Department". Also, Department of Higher Education has a role in higher education quality assurance with the function of registration of higher education institutions.

Though it is mentioned in the Maldives Qualifications Authority mandate that it is an independent agency, the stakeholders did not agree with this. This is due to the influence exerted by various parties on the quality assurance agency. Figure 2 provides a visual presentation of the influence over the quality assurance agency in the Maldives.
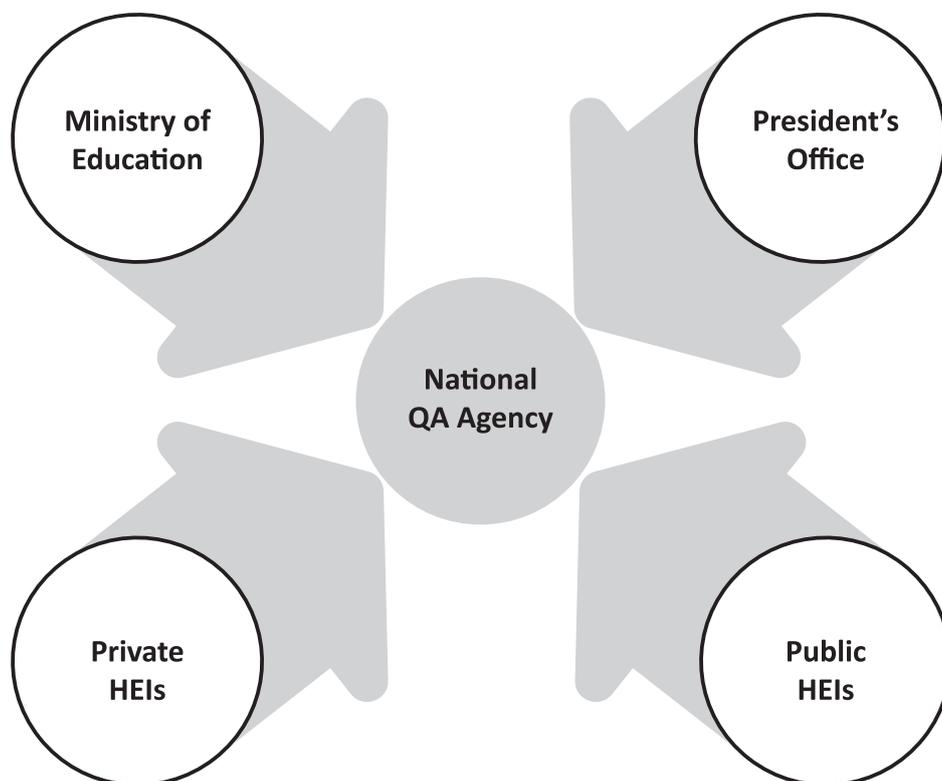
Figure 2: Influences over the quality assurance agency in the Maldives

As displayed in Figure 2, there is a lot of outside influence over the quality assurance agency in the Maldives. The influence from the Ministry of Education is because as per the mandate of the Maldives Qualifications Authority, structurally it is under the Ministry. Therefore, there is inevitable influence from the ministry. The influence of the President's Office is largely because the Maldives Qualifications Authority was created by a presidential decree (without legislation) and therefore, one would assume President's Office has the ultimate authority over the quality assurance agency. This was backed by some stakeholders who cited incidents of direct interference from the President's Office. The influence of the private higher education institutions was revealed by some higher education institutions when they complained about more influential private higher education institutions in the Maldives Qualifications Authority board. The influence of the public higher education institutions, especially The Maldives National University, was probably due to their conception of superiority over others with their superior resources, compared to others. This undermines some of the quality assurance arrangements in place. The best way to regulate and minimise the influence is through legislation (ENQA, 2006, 2015).

Whilst the concept of autonomy was largely appreciated, the nature of autonomy also seemed to be crucial for both the quality assurance agency and the higher education institution stakeholders. While the findings show that these various outside influences affect the overall independence of the quality assurance agency, it is questionable whether full independence is achievable and realistic given that the Maldives is a small state. Figure 3 illustrates the current nature of independence in the Maldivian higher education quality assurance.

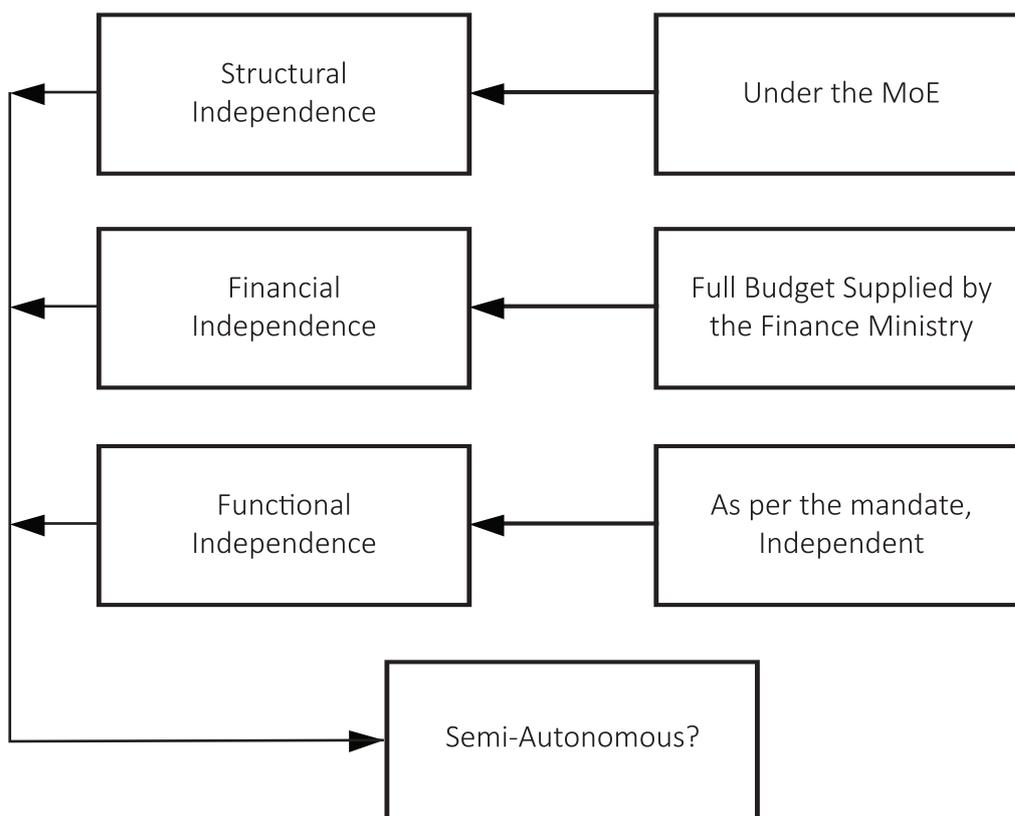**Nature of Independence in the HE QA System in the Maldives**

Figure 3: The nature of independence in the Higher Education Quality Assurance (HE QA) system in the Maldives

As can be seen in Figure 3, there are three types of independence in play. They are structural, financial and functional independence. The findings show that with full functional independence by having decision-making power, the quality assurance agency could function as a semi-autonomous organisation. This could make the agency a much desired single strong national quality assurance agency. King (2007) notes that in order to promote greater consistency and efficiency, and as a response to growing pressure on higher education quality assurance regulatory systems worldwide, a single one-tier system may be the way forward. This notion of one single strong agency or one-tier system for higher education quality assurance is supported by the participants of this study. Such a system is more suited to small states, for better utilisation of limited human and physical resources; areas in which small states are known to struggle (Stella, 2010). Legislation is needed to protect the functional independence of the quality assurance agency and also provide a means for public transparency (ENQA, 2006). Such a legislation that encompasses necessary roles and functions will also provide a mechanism for an appeals process outside the MQA.

5.2.2 Representativeness in the quality assurance agency's board

In the case of the Maldives, the governance structure of the higher education quality assurance system is based on a board called 'Governing Board', and a Chief Executive Officer who manages the quality assurance agency, which is the Maldives Qualifications Authority. Majority of the stakeholders noted the inclusion of private higher education institutions in the board membership as a positive change. To have a small government appointed board is one of the key characteristics of a strong national quality assurance body identified by a review of the Portuguese quality assurance system carried out by the European Association for Quality Assurance in Higher Education (ENQA, 2006).

Even with the inclusion of private colleges in the board membership, the issue of equal representation didn't fade away. This equal representation seemed a complex issue to address, especially with existence of varying interests of different colleges, as indicated by their conflict of interest in the following section. A notable improvement in the Maldives case was a policy change to include representation of private higher education institutions in the Board. This change minimised from the Board the monopoly exercised in decision making by the leading higher education institution in the country, the Maldives National University. This shift supports the need to equity and fairness in the quality assurance decision making. Though a more inclusive and transparent approach was adopted to select board members after the creating of the Maldives Qualifications Authority, the issue of equal representation and influence of some members more than others were raised by the participants of the higher education institutions. The issue may have been addressed with the recent composition of the Board membership. The question, therefore, is what are the best criteria to select board members? The membership allocation could be on the basis of experience in higher education and in quality assurance. According to ENQA review, the board members are to be appointed in their personal capacity (ENQA, 2015). That may sound like a solution only if all stakeholders agree. However, in a small state like the Maldives, gaining that consent could be difficult to achieve. Even with respect to the members selected in their personal capacity, caution has to be taken not to select some officials of some colleges in their personal capacity – leading to unequal representation of some colleges/ institutions. Another solution could be allocation of members based on the number of students an institution serves.

5.2.3 Conflict of interest

The findings show the existence of conflict of interest in the selection and operation of the governing board of the quality assurance agency in Maldives. It became apparent that while inviting the private higher education institutions to the board might have increased the transparency of the processes of the Maldives Qualifications Authority; it also risked creating more disagreement and also creating space for additional individual interests to creep into the system. This sort of conflict of interest negatively affects running of the Board and ultimately

the whole organisation and the system. Carlson and Davidson (1999) found out that conflict of interest in such boards ultimately do a lot of harm with increased animosity, destroying trust, and making it difficult for the board to address issues that matter the most.

Findings in this study suggest that there are three levels of conflict of interest apparent in the higher education quality assurance agency's governing board. Figure 4 shows the levels of conflict of interest in the Maldives Qualifications Authority board membership.
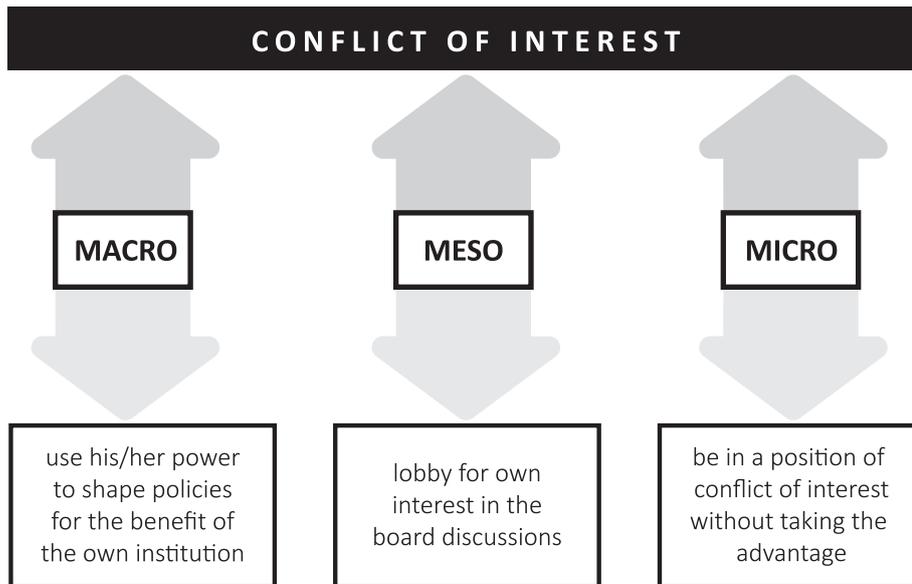

CONFLICT OF INTEREST

MACRO	MESO	MICRO
use his/her power to shape policies for the benefit of the own institution	lobby for own interest in the board discussions	be in a position of conflict of interest without taking the advantage

Figure 4: The Levels of conflict of interest at Maldives Qualifications Authority board

As illustrated in Figure 4, three levels of conflict of interest are seen in the Maldives context. This is based on the analysis of the levels of influence asserted by the Board members for their own benefit as was identified by Dopfer, Foster and Potts (2004). Micro-meso-macro architecture used by Dopfer et al. to develop an analytical framework can be applied to analyse the levels of conflict of interest. Macro level conflict of interest is the worst case scenario where some of the members exerted their senior government position to approve policies that are particularly beneficial to their own higher education institutions, through the board and if necessary exert influence over the agency to approve that policy. The meso level conflict of interest is mid-range where some board members lobbied for their own interests in the board discussions. The minimal level is the micro level where some members just happened to be in a position of conflict of interest without actually taking advantage of that in the board discussions. The micro level of conflict of interest may not be avoidable in a small state like the Maldives and it may not cause undue negative effects on the quality assurance system. However, the other two levels of conflict of interest may be quite detrimental to the whole quality assurance system.

While conflict of interest is a major challenge for small states, it is always important to try

to minimise conflict of interest and its risks. A European Association for Quality Assurance in Higher Education review suggested that separation of quality assurance agencies from the government functions and the higher education institutions can have a mitigation effect against any risk of conflict of interest (ENQA, 2006). This indicates the interrelation of conflict of interest to the independence of the quality assurance agency and how strong it is as a single national quality assurance agency.

5.2.4 Transparency in policy formulation

The notion of transparency of a higher education quality assurance agency in terms of its policy formulation appeared to be related to the "unbiased decision-making" by adopting clearly defined processes that are consistently used by Maldives Qualifications Authority, often referred to as "standard operating procedures" (SOPs). While dissemination of information regarding establishment and implementation of standard operating procedures to the public was noted in the data analysis as critical for transparency of policy formulation, there was some concern by higher education institutions stakeholder on how those policies and decisions are made. Publishing policies on the website of the quality assurance agency, so that it will be publicly available, is one of the accountability procedures advocated by the European higher education quality assurance circle (ENQA, 2015).

6. Conclusions

The concept of vulnerability of higher education institutions in small states is now internationally recognised (Commonwealth Secretariat, 2007). The findings suggest that small states face unique challenges in developing and establishing fully-functioning quality assurance systems for higher education. These challenges generally are related to the context of small states, such as lack of human and physical resources, economy of scale or small size of population, land area and Gross Domestic Product (GDP). Quality assurance agencies find it challenging to appoint independent members to the governing board since those with professional capacity in quality assurance often work in the government or in higher education institutions and because of potential career mobility, conflicts of interest interferes in the decisions they make about institutions for quality assurance purposes. Hence, some of the regulatory models used by larger nations may not be appropriate for small states (Pillay & Kimber, 2009). This study only strengthens the belief that small states need to develop higher education quality assurance systems that are fit for their purposes. This adds weight to the definition of quality as fit for purpose.

This study cited the slow speed of establishing and implementing higher education quality assurance in the Maldives. This is shown especially with the slow progression of introducing

legislation for higher education quality assurance in the Maldives. The slow speed was also noted in the INQAAHE study of small states of the Commonwealth (Stella, 2010). This suggests that slow speed in doing things is typical of small states.

The findings of this study provide the following insights for future research in the field of higher education quality assurance. Firstly, as the higher education quality assurance is emerging as a system, there is a need for more research that look at the higher education quality assurance in a holistic way as a system; not just focussing on one or two aspects, but all quality assurance areas. Secondly, the importance of quality assurance in higher education is becoming more important as larger numbers of secondary school students will enrol, demanding new definitions of quality in the future. This suggests that small states need professionals who are specialised in the field of higher education quality assurance to run quality assurance agencies, to have the knowledge to develop self-regulatory mechanisms of quality assurance within institutions and work as experts in the field who can provide external quality assurance support to institutions and government identified quality assurance agencies. The issue of a lack of human resources in the Maldives quality assurance agency was noted. This was especially highlighted as a common issue for small states (Harman, 1996; Stella, 2010).

Despite the limited pool of experts in the field of the higher education quality assurance in small states, to date, it is not known to have university programmes – except very few – designed to train and educate people in this field. Availability of educational programmes in the field of higher education quality assurance could develop the capacity for a quality culture to be supported and developed within higher education institutions in small states as they work towards self-regulation, within the context of providing fit for purpose quality education.

References

Ala-Vähälä, T., & Saarinen, T. (2010). Building European-level quality assurance structures: Views from within ENQA. *Quality in Higher Education, 15*(2), 89-103.

Baldwin, R., Cave, M., & Lodge, M. (2011). *Understanding regulation: Theory, strategy, and practice.* Oxford: Oxford University Press.

Bathmaker, A. (2015). Thinking with Bourdieu: thinking after Bourdieu. Using 'field' to consider in/equalities in the changing field of English higher education. *Cambridge Journal of Education, 45*(1), 61-80, DOI: 10.1080/0305764X.2014.988683

Beerkens, M. (2015). Agencification challenges in higher education quality assurance. In E. Reale, & E. Primeri. (Eds.), *The Transformation of University Institutional and Organizational Boundaries.* Higher Education Research in the 21st Century Series. Sense Publishers, Rotterdam, https://doi.org/10.1007/978-94-6300-178-6_3

Billing, D. (2004). International comparisons and trends in external quality assurance of higher education: Commonality or diversity? *Higher Education, 47*(1), 113-137.

Blackmur, D. (2008). A critical analysis of the INQAAHE guidelines of good practice for higher education quality assurance agencies. *Higher Education, 56*(6), 723-734.

Bogue, E.G. (1998). Quality assurance in higher education: The evolution of systems and design ideals. *New Directions for Institutional Research, 99*, 7-18.

Bradley, D., Noonan, P., Nugent, H., & Scales, B. (2008). *Review of Australian higher education.* Canberra: Department of Education, Employment and Workplace Relations

Campbell, D. F., & Carayannis, E. G. (2012). *Epistemic governance in higher education, Quality enhancement of universities for development*. New York: Springer.

Carlson, M. S., & Davidson, A. S. (1999). After the election: How do governing boards become effective work groups? *State and Local Government Review, 31*(3), 190-201.

Commonwealth Secretariat (2007). Final statement. International conference on small states and economic resilience (p. 3). Malta: Commonwealth Secretariat.

Creswell, J. W. (2003). *Research design: Qualitative, quantitative and mixed methods approaches* (2nd ed.). Thousand Oaks, CA: Sage Publications.

Dopfer, K., Foster, J., & Potts, J. (2004). Micro-meso-macro. *Journal of Evolutionary Economics, 14*(3), 263-279.

European Association for Quality Assurance in Higher Education. (2006). *Quality assurance of higher education in Portugal: An assessment of the existing systems and recommendations for a future system.* Helsinki.http://www.enqa.eu/indirme/papers-and-reports/occasional-papers/EPHEreport.pdf

European Association for Quality Assurance in Higher Education. (2015). *Standards and guidelines for quality assurance in the European higher education area (ESG).* Brussels, Belgium.

Ewell, P. (2008). The "Quality Game": External review and institutional reaction over three decades in the United States. In D. F. Westerhiejden, B. Stensaker, & M. João Rosa (Eds.), *Quality Assurance in Higher Education: Trends in Regulation, Translation and Transformation.* (pp.119-153). Dordrecht: Springer

Harman, G. (1996). *Quality assurance for higher education: Developing and managing quality assurance for higher education systems and institutions in Asia and the Pacific.* Bangkok: UNESCO Principal Regional Office for Asia and the Pacific.

Harman, G. (1998). Quality assurance mechanisms and their use as policy instruments: Major international approaches. *European Journal of Education, 33*(3), 331-348.

Harvey, L., & Green, D. (1993). Defining quality. *Assessment & Evaluation in Higher Education, 18* (1), 9–34.

Harvey, L., & Williams, J. (2010). Fifteen years of quality in higher education. Q*uality in Higher Education, 16*(1), 3-36.

Houston, D., & Maniku, A. A. (2005). Systems perspectives on external quality assurance: Implications for micro states. *Quality in Higher Education, 11*(3), 213-226.

INQAAHE (2013). Full members. http://www.inqaahe.org/members/list-full.php

Keevy, J., West, P., Schmidt, A., Hope, A., Lene, P., & Manabile, E. (2008). *Transnational qualifications framework for the virtual university for small states of the commonwealth: Concept document.* Pretoria, Vancouver: Commonwealth of Learning (COL), South African Qualifications Authority (SAQA).

King, R. P. (2007). Governance and accountability in the higher education regulatory state. *Higher Education, 53*(4), 411-430.

Lægreid, P., &Verhoest, K. (2010). Introduction: Reforming public sector organizations. In P. Lægreid & K. Verhoest (Eds.) *Governance of Public Sector Organizations: Proliferation, Autonomy and Performance.* Basingstoke: Palgrave Macmillan.

Lewis, R. (2009). Quality assurance in higher education – its global future. *In Higher Education to 2030* (2), 323-352. OECD.

Maldives Qualifications Authority. (2018). Maldives Qualifications Authority website. http://mqa.gov.mv/

Maldives Qualifications Authority. (2017a). *Guidelines for Programme Approval.* http://www.mqa.gov.mv/uploads/Guidelines-for-Programme-Approval.pdf

Maldives Qualifications Authority. (2017 b). *Guidelines for Programme Accreditation*. http://www.mqa.gov.mv/uploads/Guidelines-for-Programme-Accreditation.pdf

Maldives Qualifications Authority. (2017c). *Guidelines for Institutional Audit*. http://www.mqa.gov.mv/uploads/Guidelines-for-Institutional-Audit.pdf

Manyaga, T. (2008). Standards to assure quality in tertiary education: The case of Tanzania. *Quality Assurance in Education, 16*(2), 164- 180.

Mauritius Qualifications Authority (MQA) (2018). Regulatory Framework. Retrieved 13 March, 2018, from http://www.mqa.mu/English/Regulatory%20Framework/Pages/default.aspx

McCourt, W. (2013). *Models of public service reform: A problem-solving approach.* Policy research working paper, No. 6428. Washington D.C: The World Bank. Available from http://www-wds.worldbank.org/external/   default/WDSContentServer/WDSP/IB/2013/04/30/000158349 _20130430082936/Rendered/PDF/wps6428.pdf

National Assembly (Mauritius). (2001). The Mauritius Qualifications Authority Act 2001: The Mauritius Qualifications Authority

New Zealand Qualifications Authority. (2012). Legislation. Retrieved from http://www.nzqa.govt.nz/about-us/our-role/legislation/

Office of Legislative Drafting and Publishing (Australia). (2011). Tertiary Education Quality and Standards Agency (Consequential Amendments and Transitional Provisions) Act 2011: Attorney-General's Department, Canberra, Australia. Retrieved from https://www.legislation.gov.au/Details/C2011C00582

Parliament of Malaysia. (2007). Malaysian Qualifications Agency Bill 2007.

Parliament of the Republic of South Africa. (2008). National Qualifications Framework Act 67 of 2008: South African Qualifications Agency.

Rizvi, F. & Lingard, R. (2009). Globalizing education policy. New York, USA: Routledge. Samoa Qualifications Authority (SQA) (2018). Legislation. Retrieved from http://www.sqa.gov.ws/?page_id=486 *South African Qualifications Authority* (2012). Legislation. Retrieved from http://www.saqa.org.za/show.asp?id=2701

Stella, A. (2010). *INQAAHE project on Small States: Situational analysis on quality assurance in Small States.* INQAAHE. Retrieved from www.inqaahe.org/main/capacity-building-39/qa-in-small-states

The World Bank (2012). *Human capital for a knowledge society: Higher Education in the Maldives*: An evolving seascape. Washington DC: The World Bank.

United Nations (1994). *Report of the global conference on the sustainable development of Small Island Developing States.* Bridgetown, Barbados.

United Nations Educational, Scientific and Cultural Organisation. (2011). External quality assurance of tertiary education in small states: What are the options? IIEP Policy Brief. *Tertiary education in Small States N ° 1*. http://unesdoc.unesco.org/images/0021/002189/218977e.pdf

Van Vught, F. A., & Westerheijden, D. F. (1994). Towards a general model of quality assessment in higher education. *Higher Education, 28*(3), 355-371.

Waheed, A. H. (2005). Country Report: Maldives. Paper presented at the Competence Building in APACC Accreditation. Manila: Colombo Plan Staff College. Retrieved from http://www.apacc4hrd.org/conf_workshop/apacc05/CR

Waheed, A. H., & Pillay, H. K. (2012). A higher education quality assurance model for Small States: The Maldives case study. *IAMURE: International Journal of Education, 2*(1), pp. 266-285.

World Bank, & Commonwealth Secretariat (2000). Small States: Meeting challenges in the global economy. Washington, D.C.

Yin, R. K. (2003). Applications of case study research. Thousand Oaks: Sage Publications.