International Journal of Institutional Research and Management
International Institute of Applied Informatics
2023, Vol. 7, No. 1, IJIRM749

Towards the Establishment of Program Evaluation System in Japanese Higher Education: Learning from the Quality Code Adopted in the United Kingdom

Satoshi Ozeki [*], Toru Hayashi [†], Patrick Shorb [‡],
Maureen A. McLaughlin [§], Christopher W. Hughes [**]

Abstract

Despite global trends in quality assurance emphasizing degree-specific learning outcomes, Japanese higher education has yet to develop an effective evaluation system at the degree-program level. Recent Japanese educational policies strongly suggest the need for ensuring program-level learning outcomes and corresponding evaluation systems. As such, this paper explores how to establish sound program evaluation processes in Japanese higher education by identifying an international example and examining its essential components. Firstly, this paper analyzes recent policy trends with survey results related to quality assurance systems in Japanese higher education. It explores the development and implementation of program-level evaluation practices, internal quality enhancement processes and external quality assurance mechanisms. Secondly, it will refer to the quality assurance systems adopted by higher education in the United Kingdom and discuss its key elements. The parallels between the recent reforms and the policies implemented by the United Kingdom suggest potential comparative value that could be a useful reference for the enhancement of the Japanese system. This transnational analysis will also elucidate the benefits and challenges of articulating program-level internal and external quality assurance frameworks. Lastly, this paper draws on the specific case of England to illustrate how a program evaluation framework could further the enhancement efforts of the Japanese system.

Keywords: Cross-Cultural Comparison, Educational Program Evaluation, Higher Education, Quality Assurance, Quality Code

[*] The University of Miyazaki, Miyazaki, Japan
[†] Kanazawa University, Kanazawa, Japan
[‡] Kansai University of International Studies, Hyogo, Japan
[§] Northumbria University, Newcastle upon Tyne, United Kingdom
[**]The University of Warwick, Coventry, United Kingdom

1 Introduction

In recent years, Japanese higher education has paid increasing attention to the practices of and interrelationship between internal and external quality assurance. Internal quality assurance refers to a set of "policies and practices whereby academic institutions themselves monitor and improve the quality of their education provision," while external quality assurance "refers to supra-institutional policies and practices whereby the quality of higher education institutions and programs are assured" [1]. In line with global trends, creating a meaningful link and closer coordination between internal and external quality assurance has become an important issue in Japan. Successful coordination between internal and external quality assurance systems has significant implications for quality enhancement [2]. Particularly at the level of the academic program –with its inevitable prioritization of teaching and learning quality—higher education systems around the world have found it necessary to differentiate between, but also closely align with, the interrelated domains of internal quality practice and external quality assessment. This trend has been further strengthened in Japanese universities as program-level quality has been emphasized in recent years. Expanding on our previous discussions related to issues of program evaluation in Japan [3], this paper focuses on the importance of establishing sound program evaluation systems in Japanese higher education. This paper will thus draw upon the comparative example of the UK quality assurance systems, specifically the crucial role played by the Quality Code, as one example of how program level quality assurance can function in practice.

2 Overview of Quality Assurance in Japanese Higher Education

2.1 Educational Policies and New Demands of Japanese Quality Assurance

Program-level quality assurance has been greatly emphasized in recent Japanese higher educational policies. In 2017, for example, an amendment to the Implementation Regulations for the Basic Act on Education was enacted. The amendment mandated that Japanese universities devise and publicize their so-called "Three Policies." These include 1) a "Diploma Policy", which specifies the learning outcomes of a program, 2) a "Curriculum Policy", which indicates the educational content and methods of a program, and 3) an "Admissions Policy", which refers to the admissions criteria and student preparation required by a program. In the previous year, the University Education Group in the Central Council for Education's Subdivision on Universities released guidelines for establishing and managing the three policies. The guidelines clarified that these policies should be utilized as organizing frameworks to articulate basic internal quality assurance principles [4]. Furthermore, the Central Council for Education released the "Grand Design for Higher Education 2040" in 2018, reiterating the need to strengthen quality assurance based on the three policies [5]. Therefore, there has been a clear trend towards expanding program-level quality assurance systems in Japan.

Japan's new approach towards quality further accelerated when the government advisory panel, the Central Council for Education's Subdivision on Universities published its "Guidelines for the Management of Teaching and Learning" in January 2020. This document described the specific structures of internal quality assurance at the institutional, degree program, and course levels. (Refer to Figure 1.)

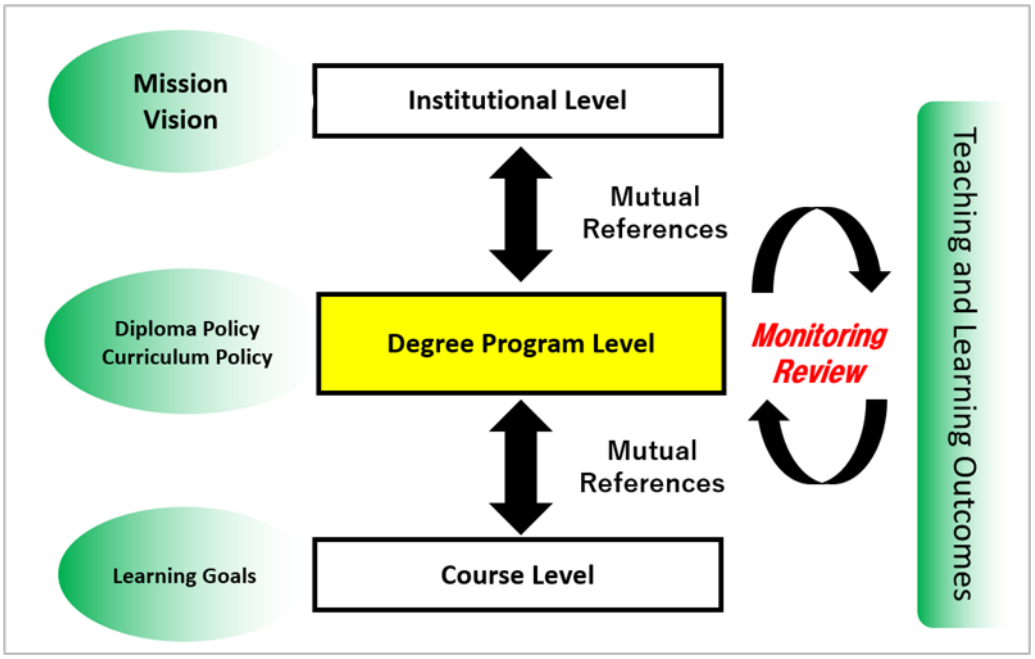

Figure 1: The Three Levels of Teaching & Learning Management (Excerpt from Ozeki et al. [3])

It required higher education institutions (HEIs) to evaluate and improve teaching and learning at these three levels based on expanded student learning outcomes data that institutions were also expected to start collecting [6]. The guidelines further asked HEIs to monitor and review programs based on the Three Policies --specifically the "Diploma Policy" and "Curriculum Policy" -- mentioned above. More broadly, the guidelines stipulated that higher education learning must be well-defined and based on the educational aims of all three levels: be it at the highest level of institutional mission and vision, the intermediate level of program learning outcomes, and/or at the classroom-level of individual course learning goals. As a result, Japanese universities have been under increasing pressure to evaluate the appropriateness and amount of their students' learning. They must verify the curricular quality of their education programs through evidence-based and quantitative means. In practical terms, the new demands of external quality have also meant that HEIs develop effective internal procedures to enhance the learning of students. However, it can be difficult to simultaneously reconcile sincere, independent efforts at internal enhancement with high-stakes, broadly publicized outcomes of external audits of quality. As an international study has noted [2], external evaluation, if not carefully developed and conducted, risks reducing the autonomy of internal quality assurance practices in many countries. Particularly at the program-level, this coordination of internal and external quality assurance has therefore become both urgent and increasingly fraught [7].

2.2 Recent Developments in Japanese Quality Evaluation and Accreditation

The self-conscious differentiation between internal and external quality processes is relatively new in Japan. Under the influence of American higher education models during the Occupation era (1945-1952), independent quality assurance organizations such as the Japanese University Accreditation Association created a system of self-evaluation focusing on institutional performance in teaching, research, organization, and management. Recent revisions of the School Education Law of 2002, however, mandated that universities receive evaluation and accreditation

from organizations certified by the Ministry of Education, Culture, Sports, Science and Technology (MEXT) once every seven years. Now in its third cycle, this accreditation process is evaluating quality at all Japanese HEIs.

Even as Japanese higher education has expanded its external quality processes, there has also been a corresponding prioritization of internal enhancement at the program level. Given the need for academic programs to deliver sufficient learning to students, this emphasis on education is unsurprising. One of the focuses of the third round of MEXT-certified accreditation, for example, is the creation and management of internal quality assurance procedures, specifically the coordination of teaching practices with program-level learning outcomes [8]. The National Institution for Academic Degrees and Quality Enhancement of Higher Education (NIAD-QE), an accrediting body that evaluates more than one hundred primarily national and public HEIs, requires the evaluation of quality in the following six main areas [9]:

Area #1: Standards for Basic Organizations for Education and Research.

Area #2: Standards for Internal Quality Assurance.

Area #3: Standards for Financial Management, Administrative Management, and Publication of Information.

Area #4: Standards for Facilities and Equipment, and Student Support.

Area #5: Standards for Student Admissions.

Area #6: Standards for Academic Programs and Learning Outcomes.

Despite NIAD-QE being an external quality assurance body, it is noteworthy that it places significant emphasis on the strengthening of HEIs' internal quality processes. Area #2 is entirely devoted to internal quality assurance, with its three priority items (the Standards 2-1 to 2-3 listed below) requiring detailed and concrete elaboration of internal quality systems and processes [9]:

Standard 2-1: [Priority item] An organizational structure for internal quality assurance is clearly defined.

Standard 2-2: [Priority item] Procedural rules for internal quality assurance are clearly defined.

Standard 2-3: [Priority item] The internal quality assurance system functions effectively.

Standard 2-4: A system for the verification of appropriateness of the inauguration and of changes to the basic organizations for education and research is installed.

Standard 2-5: A system for the maintenance and improvement of the quality of teaching and its support staff is in place.

Moreover, these requirements also imply a more detailed evaluation of learning and teaching. Evaluation Area #6 focuses on the management of a degree program's three policies. Thus, Evaluation Area #2 requires HEIs to consider its teaching and learning enhancement from both a systemic standpoint and in terms of practical management. The other four accrediting bodies besides NAID-QE emphasize similar internal quality assurance standards. For instance, the Japan University Accreditation Association, another accrediting body, has 10 evaluation areas, one of

which is dedicated to evaluating internal quality assurance. Thus, assuring student learning outcomes of a degree program becomes an essential part of quality assurance in Japanese higher education because Japan's institutional-level practices of internal and external quality assurance must include those conducted at a degree-program-level.

2.3 Recent Efforts to Enhance Quality in Japan

Government-level efforts to improve Japanese quality assurance are also ongoing. After the release of the "Guidelines for the Management of Teaching and Learning", the Quality Assurance System Group of the Central Council for Education's Subdivision on Universities began in 2020 to lead discussions on how to reform the quality assurance system. One of the recent aims of these efforts is to assure that the quality of student learning and faculty research comply with international standards. At the same time, the group also reiterated the importance of enhancing the program-level internal quality assurance based on the Three Policies of an HEI. The Group created the draft of an enhancement plan, where it strongly suggests that continuous monitoring and evaluation be required for internal quality assurance at the program level [10]. Such ongoing discussions underscore how improving the current system is imperative and essential for the future of Japanese higher education.

3 Educational Program Evaluation and its Challenges in Japan

Attempts to improve learning outcomes is not entirely new to Japanese higher education. Field-specific accreditation, for example, has existed within certain academic areas for many years. The Japan Accreditation Board for Engineering Education has evaluated and accredited educational programs in engineering, agriculture, and science since 1999. In terms of learning outcomes, it set up nine skills and abilities required for engineering education. Similarly, the Japan Accreditation Council for Medical Education was established in 2015 to evaluate medical schools. This body pays particular attention to whether medical programs meet international criteria for equivalent medical education. As a result, medical programs for physicians are now required to articulate and assess learning outcomes, and then work backwards to make improvements based on an evaluation of these results [11]. Beyond these specialized academic fields, however, program-level external evaluation mechanisms remain relatively rare.

MEXT has been aware of Japanese HEIs' lack of program-level evaluation and internal enhancement. It continues to press universities to define clear learning outcomes for their degree offerings. To better judge degree program quality, for example, the government asked Japan's scholarly community to establish academic standards for student learning. In 2008, MEXT asked the Science Council of Japan (SCJ) --the representative body of Japanese research academics in the humanities, social sciences, life sciences, natural sciences, and engineering-- to state its opinions on how educational program evaluation should take place [12]. This initiative subsequently led to the creation of discipline-specific reference standards for quality assurance at the tertiary level. As of 2021, the SCJ has created reference standards for 33 academic disciplines. Each discipline community has created a definition of its field, enumerated its key disciplinary learning outcomes, and recommended the field's most relevant or important learning methods and assessment approaches.

Even with these advancements in program-level learning assessment, however, issues remain. The reference standards of the SCJ are not statutory, and thus are used for benchmarking purposes

only. To preserve the voluntary and autonomous nature of this process, the SCJ project purposefully avoided creating guidelines specifying how to implement standards and curricula. As a result, this attempt to support the improvement of HEIs' internal quality processes has proven unable to integrate effectively with wider external quality frameworks. The actual impact of the SCJ effort has therefore proven disappointing. Although SCJ reference standards' use was encouraged in policy papers [6][8], a recent survey revealed that only one-fifth (19.9%) of Japanese HEIs refer to the guidelines when organizing curriculum [13]. Furthermore, there remains differing opinions on whether such standards are needed in academia to begin with. For some academic fields, standardizing learning outcomes is not ideal: it risks reducing the diversity of educational content. With such a basic lack of agreement over program-level evaluation methods and approaches, it remain unlikely that any external organization will be able to investigate individual academic programs based solely on SCJ reference standards in the near future. At this stage, it seems more likely that Japanese HEI program evaluation will be incorporated into an expanded internal quality assurance system [7]. How such quality enhancement initiatives will relate to and be held accountable by external stakeholders, however, requires more clarification.

4 The UK Quality Assurance System and its Focus on Educational Program Evaluation

4.1 UK Approaches to Quality Assurance

The recent actions by MEXT and the SCJ suggest that developing robust program-level quality mechanisms through an effective coordination of internal and external processes are increasingly important to Japanese higher education. Earlier frameworks that borrowed on an ad-hoc basis from American institutional accreditation models appear no longer to be sufficient. Thus, while Japanese higher education's attempt to assess general student competencies at the institutional level have drawn from U.S. practices in the past (e.g., the Value Rubrics of the Association of American Colleges and Universities); efforts to bolster quality assurance at the program-level not yet been successful. The European Higher Education Area, specifically through its quality framework of the European Standards and Guidelines (ESG), provides one potential alternative template. It is a system that places particular emphasis on the distinct but aligned relationship between internal and external quality processes. As the ESG states: "external quality assurance should address the effectiveness of the internal quality assurance processes" [14]. In particular, the flexibility of the United Kingdom (UK) higher education quality framework, particularly at the program-level, might be one possible reference point for Japanese HEIs moving forward.

The UK, in each of its distinct jurisdictions, has established internal quality assurance approaches in tandem with, and in response to, their external quality assurance framework under the ESG. Although the statutory responsibility for the registration and regulation of higher education providers remains within each nation of the UK, the non-governmental Quality Assurance Agency for Higher Education (QAA) influences internal and external quality assurance within the UK. QAA is the independent quality assurance organization for UK higher education. Therefore, it is crucial for HEIs to understand the requirements of quality assurance and to satisfy those standards developed by the QAA.

4.2 The UK Quality Code and its Focus on Program-Level Quality

In the spirit of co-regulation within the sector, the QAA took the lead in developing with the sector the UK Quality Code for Higher Education, a key reference guide for improving the management of HEI quality. Its key remit focuses on safeguarding public and student interest stakeholders in the higher education sector [15]. In particular, the Quality Code sets out expectations and standards for various aspects of quality assurance in UK higher education. Universities have been expected to conform to the Quality Code, thus allowing it to help monitor and advise on standards and quality across the four nations. The Quality Code consists of three elements that can be utilized as reference points for effective quality assurance: Expectations, Practices, and Advice and Guidance [15]. The characteristics of each element are summarized below:

1. Expectations: The outcomes that HEIs should demonstrate in order to set and maintain the standards of their educational quality.
    a. Expectations for Standards, indicating that the academic standards of courses meet the requirements of the relevant national qualifications framework(s).
    b. Expectations for Quality, indicating that courses are well-designed and provide a high-quality academic experience for all students and enable a student's achievement to be reliably assessed.
2. Practices: Operations of HEIs in fulfilling the expectations for quality assurance. The Practices are divided into Core practices and Common practices.
    a. Core practices, mandatory for all UK HEIs to assure their standards and quality.
    b. Common practices, which are practices more deliberately orientated towards quality enhancement. Common practices are not regulatory requirements in England.
3. Advice and Guidance: Theme-specific guidance that meet the standards of certain aspects of the Expectations and Practices listed above. There are 12 themes with practical advice and resources as follows: [16]

Admissions, recruitment and widening access	Assessment	Concerns, complaints and appeals
Course design and development	Enabling student Achievement	External expertise
Learning and teaching	Monitoring and evaluation	Partnerships
Research degrees	Student Engagement	Web-based learning

As 1-a and 1-b show, “courses”, which are educational programs in the UK context, are the focal point of the Expectations, Practices, and Advice and Guidance. The Quality Code was created to underpin the requirements of the academic standards of programs. Quality assurance must therefore be conducted to ensure that programs provide excellent academic experiences to stu-

dents. The Advice and Guidance reference was created to support such program-level Expectations. For instance, the Monitoring and Evaluation Theme in Advice and Guidance proposes that HEIs conduct regular monitoring and evaluation activities to ensure that students achieve target learning outcomes set out by programs [17]. Additionally, the Assessment Theme advises that student assessment should be conducted in a way that measures the degree of student achievement in a program [18].

4.3 External Evaluation Components in the Quality Code

The Quality Code has in the past helped to shape external quality assurance, as one of the key components promotes the positive deployment of external (to the institution), independent review [15]. The External Expertise Theme in the Advice and Guidance, for example, provides guidelines for additional layers of program-level quality review. This approach promotes the active use of external expertise as an integral part of quality assurance [19]. The theme advises HEIs to incorporate external experts to contribute to a program management cycle, starting from design, approval, review, delivery, and monitoring. External experts include external examiners who comment on program quality as well as the HEI's quality assurance practices. External advisers also provide professional expertise in quality enhancement to inform improvements in program design and to contribute to program level teaching practice. Other external parties, such as employers, visiting academic and alumni, are also encouraged to participate in the quality assurance process. Specifically, external examiners play an important role in ensuring program-level quality of education in the process of program delivery and monitoring as they provide program-specific feedback with following qualifications:

- A high degree of expertise in the fields covered by the program of study along with a firm understanding of UK higher education.
- Experience in program design and student assessment.
- Academic experience and subject knowledge to assess the academic standards of the program and an ability to identify good practice and make program enhancement recommendations.

With their academic and evaluation expertise in specific program areas, external examiners add an additional layer of program-level quality robustness to the assurance system. External examiners also support quality enhancement efforts as they are capable of providing constructive feedback on improvements to program teaching and learning issues as well.

The Quality Code is also noteworthy for the way it incorporates the "external" feedback gleaned from engaging students. According to the Student Engagement Theme in the Advice and Guidance [20], HEIs are expected to actively involve students in their quality assurance processes. Types of student involvement include incorporating individual student feedback as well as the collective engagement of the student body through representative structures and organizations. The Quality Code reflects the view of HEIs that students are one of the key stakeholders of the system and as such they are essential sources of feedback on the quality of their student learning experiences, including matters which relate to curriculum design, development and review of programs. Thus, student engagement enhances program-level quality assurance from a perspective often overlooked by many international quality assurance schemes up until now.

4.4 Subject Benchmark Statements

In addition, Subject Benchmark Statements (SBSs) provide general guidance specifying the learning outcomes of a subject, specifically what is expected of a degree-recipient in a given program area. SBSs have been created by a group of subject specialists in a subject community and were facilitated and codified by the QAA. SBSs are expected to function as reference points for quality assurance for a certain subject [21]. Thus, SBSs have a direct influence on program evaluation. There are 77 individual SBSs, covering both bachelor's degrees with honors and masters' levels study.

The SBSs of different subjects may have different structures, but each statement typically includes the following elements:

1. Introduction of the subject.
2. The nature and extent of the subject as a discipline.
3. Subject knowledge and understanding.
4. Subject-specific skills and other skills.
5. Teaching, learning and assessment.
6. Benchmark standards.

The first item includes general information on a subject, introducing readers to the context of the subject. For instance, the introduction of the Psychology SBS provides readers with basic information on psychology, such as a brief overview of psychology as a discipline, as well as possible career paths. The second element defines the principles and scope of a subject, indicating what areas constitute the subject. The third element explains areas of knowledge and understanding specific to a subject, while the fourth item determines subject-specific skills, and other skills such as generic skills. The fifth item is concerned with the management of the course, including teaching and learning issues, and student assessment. Lastly, the minimum standards required to receive a degree in a subject area are provided in the sixth element. Learning outcomes, including subject knowledge and understanding as well as subject-specific and generic skills, are listed. Graduates in a certain subject are expected to be able to demonstrate those outcomes at graduation. Some SBSs have additional items. For instance, the Sociology SBS has the employability section, describing how sociology-specific knowledge and skills contribute to certain types of careers and graduate opportunities. SBSs therefore provide useful information in designing and reviewing the curriculum of a program.

4.5 The Case of England

In the UK, the Higher Education and Research Act (HERA) was enacted into law in 2017. According to the Act, a new regulator, the Office for Students (OfS), was established in 2018 in England. The OfS is the independent regulator in England that provides the Regulatory Framework for higher education. Four primary objectives of the regulatory framework indicate the followings [22].

All students who possess the ability and desire to receive higher education, regardless of their backgrounds, should be able to:

1. Access, succeed in, and progress from, higher education.
2. Gain a high-quality academic experience.
3. Be able to obtain employment or receive postgraduate education.
4. Receive value for their educational expenses.

The Regulatory Framework includes the Conditions of Registration, which all English HEIs must satisfy in order to be placed on the OfS' Register of providers authorized to offer higher education. The conditions range from A: Academic governance to G: Accountability for fees and funding. Condition B is concerned with academic quality, reliable standards and positive student outcomes. According to the Condition B1 in the Regulatory Framework, "The provider must deliver well-designed courses that provide a high-quality academic experience for all students and enable a student's achievement to be reliably assessed (p87)." [23]. In judging whether English HEIs meet this condition, the OfS takes into account the relevant expectations of the Quality Code, as well as results of national surveys, student feedback and other complaints. The QAA recommends referring to several reference points to describe program-level learning outcomes. Some of the reference points are summarized below [24]. They underscore the importance of ensuring program-specific learning outcomes in English higher education.

- The development of general skills, such as communication, problem-solving, critical thinking, articulated in institutional mission statements and institutional policies.
- QAA Subject benchmark statements.
- Current research or other advanced scholarship conducted by academic staff.
- Requirements stipulated by professional, statutory, and regulatory bodies.
- Occupational standards in fields where these are relevant.
- Qualification descriptors used in national qualifications frameworks.
- Relevant European or international reference points.

The OfS takes a risked-based approach to quality assessment. It targets particular attention at those HEIs considered at a risk of breaching their Conditions of Registration, subjecting them to a more intense level of review and intervention.[22]. Overall, the Quality and Standards Review, conducted mainly in the form of self-evaluation and peer-review, functions as an external quality assurance mechanism. The primary focus of the review is to investigate internal quality assurance systems and to ensure that universities in England satisfy the requirements set down by the Conditions of Registration, which were, at the time of writing, closely aligned to the Quality Code. Therefore, the key factor in both internal and external quality assurance in England has hitherto been demonstrable engagement and compliance with the core elements of the Quality Code. English HEIs thus operate to ensure program-level learning outcomes align with internal reference points such as institutional mission statements and policies, as well as compliance with external reference points such as national student engagement measures, external examiner annual reports, subject benchmark statements and any requirements stipulated by professional, statutory, and regulatory bodies where appropriate. English HEIs therefore draw upon a wide variety of sources

for articulating program-specific learning outcomes that ensure the quality and standards of program-level teaching and learning. Put in another way, English HEIs operate autonomous improvement and enhancement mechanisms, while incorporating students' and other external stakeholders' perspectives into the assessment plans of each educational program.

At the time of writing, the outcomes of a recent OfS consultation†† related to revisions to the Quality and Standards Conditions of Registration have yet to be released. It is highly likely that the distinctiveness of the English HE system might be enhanced further by a restatement of the Quality and standards conditions of registration and a deliberate move away from the Quality Code and (thereby away from the ESG) as the primary reference point. Nevertheless, HEIs across the rest of the UK continue to adhere to the Quality Code as the main focus for guidance on practical approaches to quality assurance and enhancement.

5 Insights from the UK System for Japan

The initiatives now being pursued by Japanese higher education could benefit from studying the quality models found in the UK. The overall quality assurance framework of the UK system, specifically that seen in England is summarized in the diagram below (Figure 2).

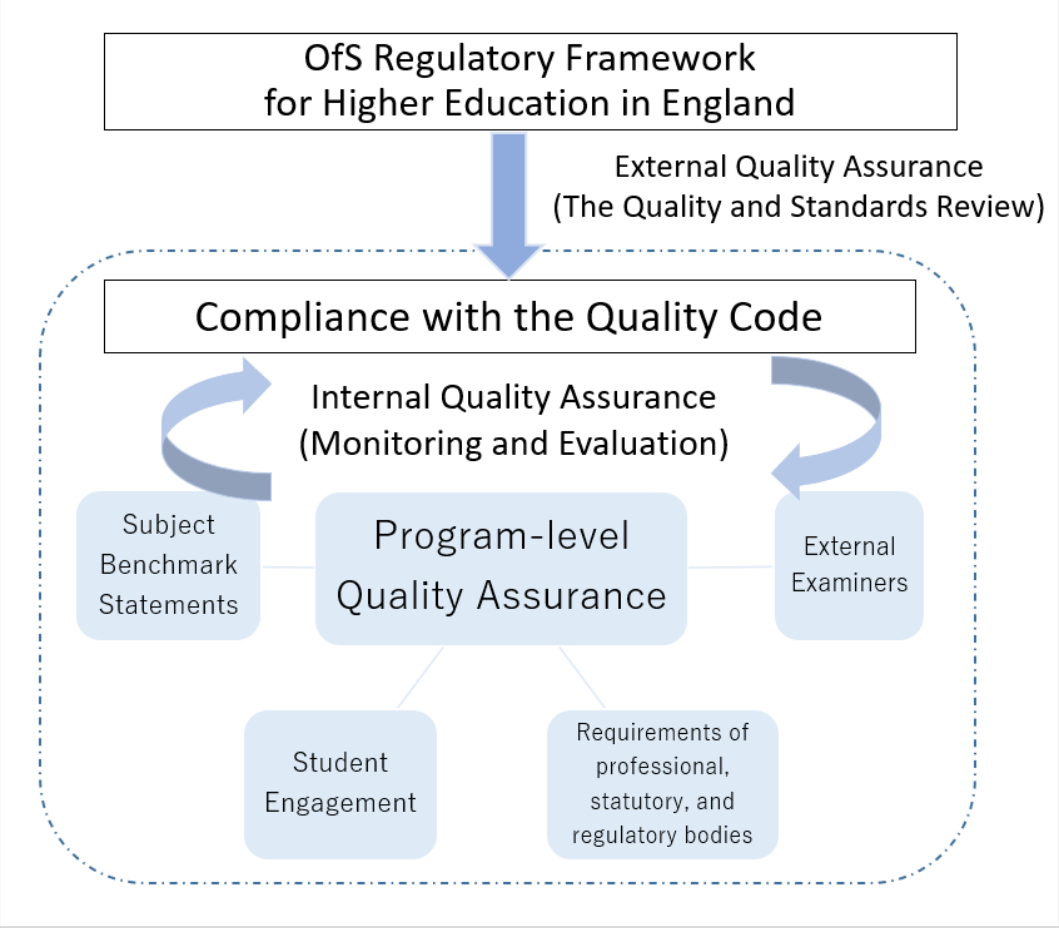

Figure 2: The England Framework for Program-level Quality Assurance

†† OfS Consultation on quality and standards conditions (officeforstudents.org.uk)

Firstly, the OfS' Regulatory Framework in England with its risk-based approach could offer one possible model for the Japanese system to encourage a hybrid system of internal enhancement and external quality accountability. The UK's concept of quality "co-regulation" nicely captures this balancing of institutional, regulatory and community stakeholder interests [25]. Until now, Japanese HEI programs have struggled to effectively coordinate between the internalist need for autonomy, experimentation, and innovation with the externalist imperative to hold programs accountable for students' educational outcomes. The quality mechanisms established by an independent and respected independent third party provider such as the QAA allows for internal and external processes to be kept distinct. At the same time, this arrangement maintains a general alignment of interests among stakeholders around a broad set of educational goals. Particularly at the program level --where teaching and learning issues take preeminence—the reliance on independent third party providers such as the QAA could be one way to build trust among relevant stakeholders to assure better classroom outcomes. With some modification, current accreditation bodies such as the NIAD-QE could become possible candidates for taking on this coordinating role.

Secondly, the QAA's subject benchmark statements might provide a useful template for how Japanese higher education could improve program-specific quality assurance through the clearer definition of discipline-based domains [12]. Japanese HEIs are moving away from a traditional teacher-oriented education model based on teaching inputs. There will be more emphasis on student-oriented learning outcomes in the future [5]. To advance program-level evaluation, therefore, the first step is to define commonly agreed discipline-based learning outcomes. The articulation of learning standards from a respected quality assurance authority such as the QAA could therefore be one way to promote such a learning outcomes approach across a given field. Indeed, discipline-specific standards have already attracted some interest among Japanese HEIs: 84.1% of Japanese universities indicate that they would attempt to align their Diploma Policies and human resources development goals with their curricular organization [13]. A strengthened SCJ framework based on a UK subject benchmark model could inject new life into the "Three Policies" approach advocated by MEXT. Currently, the push for an outcomes-based learning is flagging. As of the 2019 academic year, only 56.7% of all universities in Japan have formulated degree-level assessment plans based on educational outcomes, and only 60.4% reported assessing student learning outcomes at the degree/program level [13]. Such figures could be higher, and recent program-level surveys indicate the continuing difficulty of assessing Diploma Policy-based outcomes both at the degree- and course- levels [26]. A coordinated learning-outcomes approach based on universally agreed-upon subject standards might be one way to accomplish this.

Thirdly, the Quality Code's use of multiple reference points of learning evaluation provides a flexible way to ensure that all Japanese diploma programs can participate meaningfully in quality enhancement. As useful as a standards-oriented approach may be in some instances, it might also prove unsuitable across a diverse range of program types. As noted above, institutional-level use of discipline-specific quality standards still hover at 19.9%. Regardless, the continuing lack of assessment of learning outcomes among many Japanese HEI programs risks undercutting the systemwide effort to improve quality. Additional layers of quality confirmation such as incorporating the feedback of students, external reviewers, professional bodies, alumni, and employers could improve this program-level quality assurance process. An internal framework that can help externally vouch for a program's basic education quality provides an adaptable, multi-layered way of incentivizing learning enhancement and reform. Otherwise, less educationally committed programs could continue to attract prospective students simply by "free-riding" –i.e., relying on their institution's overall reputation and admissions selectivity. In such a vicious-cycle, direct

improvements to program-level teaching and learning innovation risk being neglected as program effectiveness is not properly recognized. Recent examples of innovative assessment approaches within Japanese tertiary education, such as the Pivotal Embedded Performance Assessment [27], wherein program-level assessment is accomplished through course-embedded, case-based performance tasks, show the potential dynamism of Japanese higher education learning. Nonetheless, without a super-institutional mechanism assuring program-level learning, such beneficial classroom reforms will likely remain isolated, underappreciated and lacking the ability to effect broader change.

6 Conclusion

Over the last of couple decades, the UK has implemented and formulated many useful quality assurance practices, particularly with regards to the coordination of internal and external processes at the program level. UK universities have managed to implement autonomous and case-specific learning improvements and innovations, while also incorporating students' and other external stakeholders' perspectives into the program evaluation process. Japan has also worked towards establishing an effective framework for educational program evaluation over the last two decades. Nonetheless, several challenges remain. Japanese HEIs remain hesitant to embrace the full potential implied by the "Three Policies" reform, thus mitigating the corresponding rewards of teaching and learning innovation that could be realized from such adoption. One solution to this hesitancy might be to develop UK-like program-level quality mechanisms that effectively blend the strengths of internal and external quality processes. With the better coordination of internal and external quality functions, Japanese HEI degree programs could dramatically improve quality in many ways, including through the establishment of clearer discipline-based learning outcomes and more robust feedback processes from a wider array of relevant stakeholders. The Japanese system undoubtedly would firstly need to customize and adapt any foreign model to its own unique regulatory and institutional context. Nonetheless, the UK practices and structures introduced in this article could serve as a useful, initial touchstone towards a broader re-thinking in this area.

Acknowledgment

This study was supported by JSPS KAKENHI (Grant Number JP 21K02674).

References

[1] D. D. Dill, "Quality Assurance in Higher Education: Practices and Issues," International Encyclopedia of Education, Third Edition, P. P. Peterson, E. Baker, and B. McGaw eds., Oxford: Elsevier, 2010, pp.377-383.

[2] UNESCO-IIEP, "Linking External and Internal Quality Assurance," 2018; https://unesdoc.unesco.org/ark:/48223/pf0000263247/PDF/263247eng.pdf.multi.

[3] S. Ozeki, T. Hayashi, P. Shorb, M. McLaughlin, and C. Hughes, "Implementing Program-Level Learning Outcomes in Japanese Higher Education: Insights from Quality Assurance

Approaches Adopted by the United Kingdom," in Proceedings of 11th International Congress, 2022, vol. 81, pp. 221–229.

[4] The University Education Group in the Central Council for Education's Subdivision on Universities, "Guidelines of Formulation and Operation of Diploma Policy, Curriculum Policy and Admission Policy", 2016; https://www.mext.go.jp/b_menu/shingi/chukyo/chukyo4/houkoku/__icsFiles/afieldfile/2016/04/01/1369248_01_1.pdf.

[5] The Central Council for Education, "Grand Design for Higher Education toward 2040", 2020; https://www.mext.go.jp/content/20200312-mxt_koutou01-100006282_1.pdf.

[6] The Central Council for Education's Subdivision on Universities, "Guidelines for the Management of Teaching and Learning," 2020; https://www.mext.go.jp/content/20200206-mxt_daigakuc03-000004749_002.pdf.

[7] T. Hayashi, "Twenty Years of University Evaluation in Japan," The Japanese Journal of Higher Education Research, vol. 23, 2020, pp.9-31.

[8] The Central Council for Education's Subdivision on Universities, "Summary of Deliberations: Towards the Improvement of Evaluation and Accreditation Systems," 2016; https://www.mext.go.jp/b_menu/shingi/chukyo/chukyo4/houkoku/__icsFiles/afieldfile/2016/03/25/1368868_01.pdf.

[9] National Institution for Academic Degrees and Quality Enhancement of Higher Education, "Institutional Certified Evaluation and Accreditation of Universities Standards for Evaluation and Accreditation of Universities: 2019-2026," 2018; http://www.niad.ac.jp/media/008/201901/NIAD-Standards%20for%20Evaluation.pdf.

[10] The Quality Assurance System Group in the Central Council for Education's Subdivision on Universities, "Summary of Deliberations: On the Improvement and Systemization of a Quality Assurance System for a New Era," 2022; https://www.mext.go.jp/kaigisiryo/content/20220325-mxt_koutou01-000021453_1-2.pdf.

[11] The Japan Accreditation Council for Medical Education, "Basic Medical Education: Japanese Specifications WFME Global Standards for Quality Improvement (in Japanese)," 2020; https://www.jacme.or.jp/pdf/wfme-jp_ver2.35.pdf.

[12] The Science Council of Japan, "(Investigative Committee) Responses Regarding the Current State of Discipline-Specific Quality Assurance," 2021; https://www.scj.go.jp/ja/info/kohyo/pdf/kohyo-21-k100-1.pdf.

[13] The Ministry of Education, Culture, Sports, Science and Technology, Education Division, "General Outline Regarding the State of Reforms in Educational Contents at Universities in 2019," 2021; https://www.mext.go.jp/content/20211104-mxt_daigakuc03-000018152_1.pdf.

[14] Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG). 2015. Brussels, Belgium.

[15] The Quality Assurance Agency for Higher Education, "The revised UK Quality Code for Higher Education," 2018; https://www.qaa.ac.uk/docs/qaa/quality-code/revised-uk-quality-

code-for-higher-education.pdf?sfvrsn=4c19f781_8.

[16] The Quality Assurance Agency for Higher Education, "Advice and Guidance," https://www.qaa.ac.uk//en/quality-code/advice-and-guidance.

[17] The Quality Assurance Agency for Higher Education, "UK Quality Code for Higher Education - Advice And Guidance: Monitoring And Evaluation", 2018; https://www.qaa.ac.uk/docs/qaa/quality-code/advice-and-guidance-monitoring-and-evaluation.pdf?sfvrsn=702bc181_7.

[18] The Quality Assurance Agency for Higher Education, "UK Quality Code for Higher Education - Advice And Guidance: Assessment", 2018; https://www.qaa.ac.uk/docs/qaa/quality-code/advice-and-guidance-assessment.pdf?sfvrsn=ca29c181_7.

[19] The Quality Assurance Agency for Higher Education, "UK Quality Code for Higher Education - Advice And Guidance: External Expertise", 2018; https://www.qaa.ac.uk/docs/qaa/quality-code/advice-and-guidance-external-expertise.pdf?sfvrsn=6f2ac181_6 .

[20] The Quality Assurance Agency for Higher Education, "UK Quality Code for Higher Education - Advice And Guidance: Student Engagement", 2018; https://www.qaa.ac.uk/docs/qaa/quality-code/advice-and-guidance-student-engagement.pdf?sfvrsn=6224c181_3.

[21] The Quality Assurance Agency for Higher Education, "Subject Benchmark Statements," https://www.qaa.ac.uk/quality-code/subject-benchmark-statements.

[22] The Office for Students, "Regulatory advice 1: The OfS approach to regulation," 2018; https://www.officeforstudents.org.uk/media/1092/ofs2018_02.pdf.

[23] The Office for Students, "Securing student success: Regulatory framework for higher education in England," 2018; https://www.officeforstudents.org.uk/media/a32be394-72ba-4975-bd7e-5a9b5d8c0ece/regulatoryframework.pdf.

[24] The Quality Assurance Agency for Higher Education, "UK Quality Code for Higher Education, Part A: Setting and maintaining threshold Academic Standards, The Frameworks for Higher Education Qualifications of UK Degree-Awarding Bodies," 2014; https://www.qaa.ac.uk/docs/qaa/quality-code/qualifications-frameworks.pdf?sfvrsn=170af781_18.

[25] D. Phoenix. "Higher Education co-regulation: Where do we go from here?" Higher Education Policy Institute, 28 August 2018. https://www.hepi.ac.uk/2018/08/28/6330/

[26] S. Ozeki, T. Hayashi, Y. Saito, M. Fukano, and S. Yamazaki, "An Investigation into Curriculum Management to Accomplish Learning Outcomes in Diploma Policy", Journal of Japan Association for College and University Education, vol. 43, no. 1, 2021, pp. 140-148.

[27] K. Matsushita, K. Ono, and Y. Saito, "Combining course-and program-level outcomes assessments through embedded performance assessments at key courses: A proposal based on the experience from a Japanese dental education program," Tuning Journal for Higher Education, vol. 6 no.1, 2018, pp.111-142.