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Introduction

A convergence in higher education policy would be facilitated by a wellestablished information network among the member states and a close monitoring of individual higher education systems. It appears that the factors capable of forcing a major change in the governance of higher education institutions focus not only on competitive pressures and the growth of universities (external strategies) but also on the integration and coordination of internal university policies and strategies into a coherent system of higher education for every member state. Despite any cultural, social or economic differences among countries, the process of globalisation aims, through common guidelines and interventions in the re-structuring of higher education institutions, to arrive at a common template of systemic governance (de Haan, 2015; Dobbins, 2015; Fassoulis 2014; Lazzeratti and Tavoletti, 2006; Lanford, 2016; Kickert 1997, cited by Capano and Regini 2014; Pandey, 2004; Tandberg, 2010; Van Vught, 1989; Wadhwa, 2016). Indeed, an underlying element of globalization is the utilization of education performance mechanisms such as indicators and tables, not only to emphasize the need for an improvement in the efficiency, quality and effectiveness of institutions but also to drive higher education to become more qualitative by leaning towards a key globalization principle: a common governance model.

The term 'governance' is a rather complex one as it is influenced by several factors related to human nature and to the conditions in which a country develops. Governance involves basic managerial functions, among which is the decision-making process – a function that is an inherent part of all other managerial functions. Decision making is a process that contributes to problem solving, where one of a set of alternatives is chosen with the aim of achieving organizational targets. According to many researchers (Altrichter, 2010; Beekes and Brown, 2006; Burley, Gnam, Newman, Straker and Babies, 2012; Cai and Mehari, 2015; de Haan, 2015; Lokuwadage and Armstrong, 2015; Lanford, 2016; Pandey, 2004; Tanberg, 2010; Worthington and Lee, 2008), governance is about making decisions on certain matters, mainly regarding the organization's structure, performance evaluation, the degree of autonomy and accountability of its members. Despite the complexity of the term, there are two key elements that are common in many interpretations, namely, the organization's structure and its targets & procedures. However, achieving

organizational targets certainly does not depend only on the rational and scientific coordination of all actions but also requires the willing cooperation of the organization's human resources. This collegiality and cooperation is based more on the ability of managers (those who have the ultimate responsibility for decisions) and less on scientific criteria. In other words, as a model/technique, 'governance' does not only depend on scientific criteria such as the analysis of statistics and other economic and technical variables but also on technical elements such as those required for motivating staff. Managerial aspects aside, governance can be considered as the "knowledge of how" a good result may be achieved, or as Barnard referred to it, the "knowledge of behavior" (Barnard, 1938, p. 290). The governance of organizations (including educational institutions) has a societal orientation since organizations are living organs operating within a given environment. (Altrichter, 2010; Burley, Gnam, Newman, Straker and Babies, 2012; Cai and Mehari, 2015; de Haan, 2015; Hordern, 2013; Lokuwadage and Armstrong, 2015; Lanford, 2016; Lueger and Vettori, 2014; Ntim, Soobaroyen and Broad, 2017; Parker, 2013; Rowlands, 2013; Trakman, 2008; Vidovich and Currie, 2011). The main aim of governance in an organization is to harmonize processes and to ensure the effective coordination and monitoring of its management activities.

With particular reference to the governance of higher education institutions, it is important to note that they are learning, interactive organizations whose main goal is to spread knowledge and thus influence society, either directly or indirectly (Altrichter, 2010; de Haan, 2015; Ntim, Soobaroyen and Broad, 2017; Pandey, 2004; Parker, 2013; Rowlands, 2013; Trakman, 2008; Vidovich and Currie, 2011). Hence, higher education institutions have a social responsibility and accountability towards society. On the other hand, cultural and historical features influence the preferred style/model of university governance. Indeed, the differentiation in university governance has roots in the national ideological, political and social culture within which higher education institutions operate. Although the character of university organizations is complicated and in many countries around the world can be characterized by a high degree of heterogeneity, public accountability is a common characteristic – not only towards society but also towards an organization's members (e.g. academic and administrative staff, students, etc.). For this reason, any university's governance model can be seen as a refined decision-making model, through which universities can respond appropriately and effectively to the challenges

(such as accountability and trust) that emerge through their role in the societal environment.

University governance in particular refers to the degree of managerial and economic autonomy that higher education institutions have as well as the degree to which any governance model influences academic freedom. Moreover, higher education institutions can be viewed as just another type of economic organization that deals with managerial challenges. That said, the economic dimension of universities should not interfere with their public duty, otherwise they may risk becoming "conventional organizations" (Spyridaki, 2008, p. 76) whose primary motivation is to seek out sources of funding, or even risk violating the principles of public accountability.

There are two dimensions to university governance: one concerns the management of universities and the other is purely their academic function. Any interference that involves bringing together the managerial and academic parts will result in dysfunctions. University governance is an interaction of several qualitative factors such as accountability, society, as well as the cultural and political environment. (de Haan, 2015; Lanford, 2016; Ntim, Soobaroyen and Broad, 2017; Parker, 2013; Rowlands, 2013; Trakman, 2008; Vidovich and Currie, 2011). It could be said that "internalized social and ideological conflicts at the same time reproduce internal ideological contradictions of the environment". (Edwards, Hulme and Wallace, 1999; Lewis, 2002, 2003; Spyridaki, 2008, p. 63). Within this framework, the successful achievement of universities' goals does not depend solely on the implementation of any particular model but rather on a strategy for a cooperative and collegial approach to the decision-making process, as well as a strategic target and mission for enhancing the role of universities in society.

Given that a) there have been increased pressures from external drivers to create a more marketized environment for higher education, b) university governance plays a significant role in the shaping of any improvements in higher education systems, and c) the widespread economic recession has brought abrupt changes to the economic and social forces in many countries worldwide, this study goes beyond existing comparative studies in the field since it analyzes the differences between two higher education systems that are quite distinct in terms of culture and ideology, namely, those of England and Greece. More specifically, case studies from each country are examined.

As mentioned above, the two systems under consideration in this study do indeed exhibit significant differences. However, through the use of the management technique O and M, the main aim is to consider each system individually, to critically examine each one and to see if universities are governed effectively and efficiently in the higher education system of each country. After critically examining and analyzing the current situation in each system individually, and in view of all the changes that have occurred in the internal governance of the two systems as well as the essential features of higher education governance, this study aims to derive an argument for a more strategic approach to university governance so as to improve the efficiency and effectiveness of university performance.

Indeed, no matter the background or the social or cultural forces that drive the changes in any system, education remains a fundamental sector that has a significant impact on peoples' attitudes, beliefs and values. Hence, any changes that occur in education will affect, to a great extent, not only the pure economy (in terms of employability) but also the quality of peoples' wellbeing.

This study used case studies from the selected countries mainly for the following reasons: a) in 2011 a new law related to Greek higher education governance was introduced (Greek Law 4009 /2011) and had brought changes in the governance of universities such as a decline in the power of the Senate, the entering of the council into, and the increased verticalization of, universities' decision-making processes, b) in 2011 English university governance had undergone a reform that had a great impact on the internal decision-making process with greater emphasis on the verticalization of the process, and c) in both countries those reforms have raised questions and debates around them. Moreover, despite the differences in the two systems, those reforms were introduced as a nationally-driven orientation strategy, with the English system being much more institutionally autonomous than the Greek one, which bows to central government pressures in a more verticalized governance model.

Based on the above, the purpose of this paper is:

• To investigate and assess the role played by university governance in the effectiveness and efficiency of higher education system through a) literature analysis and b) the management evaluation method of O and M (Organisation and Methods).

- (Bearing in mind that the higher education system in each country under consideration is the same in all their respective tertiary institutions) to analyze, through the case studies of the two countries, the messages and the key ideas to be drawn from the recent reforms that occurred in the two systems and, together with feedback from the case studies, to make a strong case for further investigation into the relationship between university governance and the efficiency of the higher education system (mainly in terms of quality).
- (After considering a) the fact that the Greek and English higher education systems have significant differences in terms of orientation, culture and ideology, b) the intriguing reforms and changes that both systems have undergone recently in internal governance, and c) all the essential elements of higher education governance) to argue for a more radical change in, and greater scrutiny of, university governance so as to improve the efficiency and effectiveness of university operations and thus yield a more optimal satisfaction of society's educational needs.

Research Methodology

The paper employs the technique of 'Organization and Methods' (the O and M technique) in order to investigate and assess the role played by university governance in the effectiveness and efficiency of the higher education system. This method is based on the analysis of answers to key questions such as "why is it done?" or "how is it done?" regarding the conduct of scientific observations and interviews with staff. An analysis of the responses helps the researcher to identify what is required to improve the system, both in terms of the management and efficiency of the system (Steele, 1987 cited by Blinded for Review). Using this method, and through the examination of two examples (case studies) of the governance of higher education institutions in Greece and England, the main aim of the paper is to analyze the role of university governance. The necessary information and data used in this study were obtained from a higher education institution in England and two universities in Greece. More specifically, the relevant legislative framework, documents and reports relative to university governance were studied and discussions were held with academic and administrative staff of the relevant higher education institutions. At this point it should be made clear that, irrespective of the Universities used in this study as

sources of information and data on university governance, the higher education system in each country is applied equally in all tertiary institutions of the respective country.

Using these two examples (case studies) of the university governance system in the two countries, this study attempts to a) lessen the gap between theory and practice (Bassey, 2003) and b) point out key issues in the university governance systems using both a theoretical and a practical approach.

Research Results

Example 1: University Governance in England

Research Hypothesis: System of University Governance in Greece

Based on the O and M technique we could ask the following questions:

Research Question: "What is the current situation?"

Currently, in England the council is the principal governing body with the main managerial responsibilities for the university's financial and administrative issues. The council is also the body that employs all the university staff and appoints the Vice-Chancellor. Moreover, it is mainly responsible for monitoring the university business plan. Since this business plan also deals with academic issues, the general monitoring is carried out in cooperation with the Senate. The main responsibilities of the council are centred around the university's long-term and strategic plans, including key performance indicators to monitor the university sperformance and establish evaluation methods for the effectiveness of the university. At the same time it ensures that the university will achieve the university's goals and aims while satisfying the needs and interests of the stakeholders involved.

The Senate is a collective body and has the supreme academic authority of the university. The Senate is responsible for the academic activities of the university and the promotion of its academic work in research, teaching and learning and all the related internal regulations, including those regarding the welfare, supervision and discipline of students. The Vice Chancellor of a university acts as the Chief Executive Officer of that university and his/her main responsibility is to implement university policies and strategies that will deliver the desired outcomes. Moreover, in order to assist the Vice Chancellor in his/her work, after consultation with the Senate, the

institution's Council appoints the Provost, whose work is under the direction of the Vice Chancellor.

All those changes that happened in the English higher education system have their roots in changes to sources of funding while the orientation of the English system was for a closer alignment with the market.

According to the relevant literature (Capano and Regini 2014; Ferlie and Andresani 2009; Middlehurst 2013; Shattock 2013, etc.) English higher education has experienced a radical change in the governance model of universities by incorporating a new set of strategic and managerial incentives. It is known that English universities' academic programmes are fee-based while the structure of university funding is a mixture of State resources and other financial sources. Up to 2011, the number of students enrolled in English universities was controlled by the funding council while the proportion of State funding toward universities was the greatest. However, over the years the State's proportion of funding has gradually diminished while funding from research-based funds and other sources such as student loans have increased – a fact that has an impact on volatility in terms of university funding (Shattock 2013). This volatility of many English universities has led institutions to adopt a more hierarchical and managerial model of university governance whose main characteristics are the increased centralised, vertical decision-making (mainly in terms of finance) and a weakening of academic collegial power. This new strategy of English universities has not altered their autonomy and their market-driven approach but has a significant impact on their internal governance.

Evaluation of the Case Report

England seems able to address the European higher education policy concerns and has proceeded in recent years with a round of changes based on a market-driven approach. In fact, since 1979 the English system has moved in a much more market-driven direction without losing its focus, which is to increase the role of the market in protecting the quality of higher education (Ahmed, Ahmed, Shimul and Zuniga, 2015; Brown and Carasso 2013; Capano and Regini 2014; Middlehurst, Goreham and Woodfield, 2009; Middlehurst and Texeira 2012; Ntim, Soobaroyen and Broad, 2017; Powel and Ozorhon 2012; Shattock 2013). However, it should be mentioned that, following Brexit, there may be repercussions for the higher education system, at least in the long term. In this regard, the main concern is how higher education

institutions will be funded. Up to now, English higher education institutions have largely relied on students' fees for their main source of funding since the State contributes relatively little. Brexit may have a negative influence on such institutions, not least due to the expected increase in costs for students from outside the UK to study there, making them more difficult to recruit. As a result, and given that the higher education system in England is decentralised, the impact will most likely be on the decision-making process whereby the temptation will be to transfer funds from other sources, giving rise to a more business-oriented management system. Certainly these changes, if they materialise, may well prompt discussion and debate regarding the public nature of English Universities as they strive for greater competitiveness.

With regard to the enhancement of quality assurance, in 2011 English higher education policy makers announced their intention with the so-called 'White Paper Higher Education: Students at the Heart of the System' which set out a quality framework with a heavy underlying emphasis on the very close monitoring of institutional reviews and quality standards. With this reform/change the continued emphasis on a marketised approach to higher education is self-evident, underlining more strongly the principal value of the marketing strategy which is 'keep students' (the customers) happy' (Marince and Gibbs, 2009). Using regular institutional reviews (See HEFCE 2012, cited by Brown and Carasso 2013) as its main tool, the State in England anticipates having better management control of institutions' volatility while at the same time being assured of having in place a regulative framework to protect quality in academic standards. The entrepreneurial approach of the English system also arises from the increased need of identifying alternative sources of finance for its higher education institutions. As a) the main source of State income is through taxation (direct and indirect), b) given the negative economic outlook of the past four years, the State has had limited financial resources with which to fund higher education, and c) even in a very simplified economic system, money has its cycle (people working, paying taxes and the State paying salaries to people), then the intention of the change in the English system may not be surprising. However, "if universities behave like ordinary commercial entities the continuation of these concessions (the relation between higher education and society) may be called into question." (Brown and Carasso 2013, p. 125).

Example 2: University Governance in Greece

Research Hypothesis: System of University Governance in Greece Based on the O and M technique we could ask the following questions: *Research Question*: "What is the current situation?"

As Greece is a member of the European Union, Greek higher education policy is influenced by changes that occur in the governance of European universities - English ones included. Indeed, although the United Kingdom recently decided to exit the European Union through a national referendum (Brexit), this action had not yet taken place at the time of writing and so the governance of higher education in English universities has continued in a fashion similar to that of other European Universities.

The goal of a coherent system of governance in universities has become a universal issue due to ongoing volatility in the global economy and the rising cost of higher education. It is the appropriate allocation of resources and a clear management structure that makes the system work more efficiently, thereby securing more productive and successful performance (Blinded for Review).

Within this framework, in 2011, the Greek Law 4009/2011 had brought changes to the governance of universities, such as a shift towards a more managerial type of governance, as well as the entering of the Council into, and the increased verticalization of, universities' decision-making processes. Indeed, since 2011 the Greek higher education system has been based on law 4009/2011, according to which the main bodies of the governance of a higher education institution are: the Council, the Senate and Vice Chancellor. With particular reference to the Institutions' Council, it was first legislated through the Greek law 4009 / 2011 but appears to be more like a borrowed element from other higher education systems rather than an innovative change to the system. In accordance with this change, the Institutions' Council was made responsible for the general supervision of the institution. However, it should be mentioned that the Greek authorities recently took certain powers from the Council and assigned them to the Senate. As a result, in many Greek Universities the members of the Councils have been relieved of certain management duties and the Senate remains the upper most collective organ for decision making within Greek higher education institutions. In this situation, the relationship between universities and the State is critically important: it is possible for governments and their agencies to strongly influence universities and to limit their degree of autonomy. According to the Greek State, higher education is under the legal auspices of public law, which requires all university-level institutions to be self-governing. All these institutions primarily

earn their income from taxation, supervised by the State, and are organized in line with specific laws that deal with their operations.

The Greek academic institutions are composed of faculties that are in turn divided into departments that constitute the basic academic unit. Each department is run by a general council that formulates teaching research policy and exercises control over all of the department's affairs. The Senate is responsible for activities such as the implementation of educational and research policy, ensuring the quality of the educational and research process, as well as ensuring that the law and the internal regulations are observed. The Vice Chancellor represents the institution and can participate in the Institutions' Council but has no right to vote. Among other duties, the Vice Chancellor has the higher responsibility of determining the annual budget and internal regulations. They can call for a Senate meeting to ensure the implementation of the decisions, they can announce vacancies for academic posts and also appoint academic staff.

If one considers that a) the economic recession gripping many countries in recent years has significantly impacted upon university funding, and b) the Greek State has been the dominant source of funding for universities while the country has been own severe economic recession for the past seven years, burdened with a cycle of economic debt that has had a direct negative impact on the funding of Greek universities, then a re-consideration of the overall framework of higher education governance by Greek policy makers is not surprising. Indeed, given the Greek State's diminishing financial support towards the higher education system as well as the continuously high educational expenditures, since the passing of the new law in 2011, Greek Higher education institutions are required to charge fees for their courses. This move by the Greek Central Authorities appears to be a response to external and worldwide pressures for a more market-oriented approach to university governance. Furthermore, insights from Greek educational literature (Fassoulis 2014; Blinded for review; Terzis 2010; Papadimitropoulos 2008; Papakonstantinou 2007; Zmas 2007; etc.) reveal that Greek educational policy (higher education in particular) has traditionally been influenced by other systems en route to any reform in education. The attempt to converge towards a more managerial type of university governance in Greece was certainly oriented, to a great extent, by common causes such as the economic recession. Although, by law, Greek universities are administrative selfgoverning organisations, their main source of funding is income through taxation

(State funding) which is highly supervised by the State while organized in line with specific laws that deal with their operation (Blinded for review). Moreover, the main debate and discussion in the Greek higher education arena is the 'marketization of higher education' and the extent to which the labour market may be involved in the financing of universities. Indeed, due to cultural forces and ideologies about the higher education system, the greatest Greek academic fear of the higher education system is a market-driven approach to higher education.

Evaluation of the case report:

From the above, the slight orientation of the Greek system towards a more marketdriven approach is evident since, according to the new legislative framework (Greek law 4009 / 2011), at least at the postgraduate level, all programmes are required to charge fees for their postgraduate programmes. It should be mentioned at this point that since 1964 education in Greece, at all educational levels, has been free of charge while all State education institutions (which are the vast majority) have operated with financial support from the government and every citizen has equal educational opportunities, irrespective of family background, racial origin or gender.

With the introduction of Councils as academic bodies for the internal governance of Greek institutions, the orientation towards a more managerial model and the declining power of the Senate in the decision-making process (a totally new scenario for the Greek reality), the impact of the changes have been similar for Greece. These changes have brought disturbances not only to the institutions' governance and to the powers afforded to internal structures but also to the traditional disciplinary-based relationships.

Indeed, up until 2011 even the use of the word 'management' was almost forbidden in educational matters in Greece as this concept is widely considered to be the principal tool for monitoring performance and goal attainment in the entrepreneurial sector. But with the new framework, the concept not only entered into higher education but went beyond that, with the appointment (through an election process) of external members for a limited period of time in the synthesis of the Council (Fassoulis 2014). Although the changes that occurred in Greek universities' governance have brought the system closer to the English one by turning towards a more managerial model of governance, they did reveal a centralisation of power and authority in the hands of single academic bodies such as the Vice-Chancellor – a traditional habit in the internal structuring of

Greek institutions – therefore the changes to the Greek system did not dramatically alter the main characteristic which is the centralisation of power and authority at the top levels of an institution. However, in Greece there is no distinction between who governs and who manages a university.

Another key factor in Greece's educational landscape is the culture and ideology of the Greek people which is very difficult to change. In view of the above, the passing of a law to adopt a fee-based system for postgraduate education was a small but significant move for Greece towards the market perspective. Within this framework, in order to develop its own strategy and 'best practice', Greece seems to have become accustomed to implementing a round of reforms/changes without, however, having a specific policy/direction, or a procedure to ensure that those changes would be implemented, or even a means of assessing whether or not the system has the capacity to respond to, and sustain, any planned changes. Indeed, many Greek educational researchers have converged on this conclusion, such as Fassoulis (2014), Lianos (2007), Papakonstantinou (2007), Papadimitropoulos (2008), Blinded for Review, and Zmas (2007).

Discussion

According to the above analysis, in practice, the changes in academic governance in both countries under consideration that resulted in a decrease in the powers of the relevant academic bodies has led the education system towards a weakening of internal collegiality and cooperative spirit, with serious consequences for the decision-making process (Ahmed, Ahmed, Shimul and Zuniga, 2015; Fassoulis 2014; Ntim, Soobaroyen and Broad, 2017; Shattock 2013). Taking into consideration that changes are key components of higher educational policy in any country, both countries have been (and still are) seeking any changes that will ensure the sustainable development of the higher education system and also establish the framework within which all the relevant stakeholders should operate.

Designing a strategy for each country to materialise change is heavily dependent on the relationship between the State and its citizens as well as the degree of trust and certainty that has been built up over the years between them (Amaral, et.al. 2012; Blaschke, et.al. 2014; Fullan 2010; Hopbach 2012; Blinded for Review). Based on the latter, each country would require a range of different strategies to consider all the factors (which indeed are many and varied) that drive or affect change Page 13 of 65

in order to achieve a so-called 'best practice'. Given that the individual factors, characteristics and dimensions of any reform/change for a particular country can influence their 'best practice', there can be no 'one-size-fits-all' of a best practice for all countries.

While it is true that a market-based approach may facilitate innovation and a greater responsiveness to the needs of all stakeholders involved, it is equally true that a collaborative and collegial institution culture is crucially important for its efficient and effective performance through maintained academic standards as it instills trust and reinforces academic bodies' initiatives that aim to satisfy stakeholders' needs (Altrichter, 2010; Brown and Carasso 2013; de Haan, 2015; Harvey 2008; Ntim, Soobaroyen and Broad, 2017; Pandey, 2004; Parker, 2013; Papa, et.al. 2013; Rowlands, 2013; Shattock 2013; Trakman, 2008; Vidovich and Currie, 2011). However, given that not a single market has perfect information flow (symmetry), then the marketization of higher education may be diminishing the collegiality in the decision-making process. Certainly, the timing of information is not so important in the education sector, as 'no one has or can have the information that would enable them to make the same judgements about quality and suitability that they might make about a physical product or a less complex service' (Brown and Carasso 2013, p. 124).

The market orientation strategy, based on the fundamental principle of marketing, may indeed have a positive impact on the enhancement of the qualitative process since the increased competition among the institutions will force them to improve in order to maintain/enhance their position and consequently attract more students, both in terms of quantity and quality. However, the whole discussion and debate is not around commercial goods or services but it is about education services – a sector completely different from the business sector in terms of attitude and values (Altrichter, 2010; Antikainen, 2010 cited by de Haan, 2015; Burley, Gnam, Newman, Straker and Babies, 2012; Cai and Mehari, 2015; Capano and Regini 2014; de Haan, 2015; Eckel, 2007 cited by de Haan, 2015; Hordern, 2013; Lokuwadage and Armstrong, 2015; Lanford, 2016; Lueger and Vettori, 2014; Marince and Gibbs 2009; Ntim, Soobaroyen and Broad, 2017; Papa, et.al. 2013; Parker, 2013; Rowlands, 2013; Trakman, 2008; Volante and Ritzen, 2016; Vidovich and Currie, 2011). One could consider that the business sector aims to enhance quality so as to attract more customers and increase economic potential. However, its fundamental aim is to make

a profit. Certainly this is not the case in the education sector. While a reduction in commercial standards may not necessarily create substantial problems, any lowering of academic standards, or a reduction in the 'real' quality of knowledge, or inflated grades in academic degrees, would inflict serious damage to society and pose many difficulties in restoring that damage (Brown and Carasso 2013; Marince and Gibbs 2009; Middlehurst 2013; Middlehurst, Goreham & Woodfield, 2009; Parker, 2013; Rowlands, 2013; Salter and Tapper, 2000; Trakman, 2008; Vidovich and Currie, 2011). Therefore, the market-based policy should be handled with the utmost caution.

Moreover, it should be mentioned that when a system, such as the English one, has traditionally been conceived from a market perspective, then simply intensifying the existing approach is not likely to bring radical consequences because the system would already have been tested for its suitability and sustainability. In addition, before applying any changes to the system, a country should analyse its capacity to implement such changes. The latter is of considerable importance in any discussion on proposed changes since it must be clarified whether or not the systems have the capacity or even the potential to accommodate all the implications of such changes before a more dynamic path to growth and development is pursued. Simply imitating certain characteristics of other higher education systems and enforcing their implementation without even a period of transition certainly does not ensure any improvement in university governance or an appropriate approach for the desired outcome. In the case of the English higher education system, despite the fact that it was already accustomed to the market-driven approach and had proceeded to an even more intensive marketing perspective regarding the university governance model, still it is in a state of transition.

As academic governance entails responsibility and is a social process, its significance is heavily dependent on an institution's structure. Any change in the internal structure calls for an investigation and reconsideration of management's accountability – the role of the bodies (both collective and single) in terms of the monitoring institution's performance and responsiveness regarding all stakeholders' needs and interests. According to many English educational researchers such as Hogan (2012), Middlehurst (2013), and Shattock (2013), the English higher education landscape, at least over the last decade, includes 'a mania' (Shattock 2013, pp. 225) of restructuring institutions' internal organisation. This restructuring was actually a top-down process that was not only limited to institutions but went beyond, to the

synthesis of bodies which in their present form have members from 'outside' the university, appointed for a limited time period within which the agreed aims of the institution should be met. The net impact, however, has been an erosion of the climate of cooperation and mutual understanding among the academic community. Indeed, previous work has shown that top-down communication obstructs the flow of information and thus impedes an institution's responsiveness to the real problems (Lanford, 2016; Lueger and Vettori, 2014; Middlehurst 2013; Blinded for Review; Pandey, 2004; Starbuck 2014; Tanberg, 2010; Wadhwa, 2016). This is happening because the lower levels of the academic community do not have the opportunity to express their ideas and problems or to communicate their needs and aspirations.

Indeed, as many researchers rightly recognize that higher education institutions act as learning organizations, they see creativity and collective governance to be two key elements that contribute significantly to the promotion of social good (Eckel, 2007; Antikainen, 2010 cited by de Haan, 2015). Academic autonomy and status cannot be associated with the funding of universities since any connection with the financial policy of the university may undermine public accountability and harm the trust relationship with societal groups. University governance is open to the external environment and should respond to any rapid changes in that environment. That said, higher education institutions should be governed within a strategic framework so that under no circumstances would they respond spontaneously to environmental changes purely for financial gain. Hence, a key issue in university governance is that universities respond effectively to environmental challenges while maintaining public accountability as a top priority.

According to the case studies of the two countries, the changes that took place in the English system, such as an over-reliance on institutions' reviews, academic standards and the use of performance indicators for the enhancement of the qualitative process, are also among the changes that occurred in the Greek one, while the impact and the consequences of those changes on the university governance, such as diminished collegiality in the decision-making process and imbalances in the internal power structure, again are the same in both systems. Moreover, the roots of those changes such as the economic recession and the need for alternative sources of finance for universities are also common in both systems under consideration. A key distinction, though, between the two systems is that in English higher education the governance changes are being implemented as a transitional step while this is not the case in Greece.

One argument regarding the decision-making process is that the size of the organisation plays a key role in the effectiveness of a decision (Papalewis and Fortune 2002; Shattock 2013; Starbuck 2014). Indeed, it is true that a relatively stable organisation structure is a key element of successful decision making, especially for a medium/large-sized organisation with a strategy planning system, since such institutions are more vulnerable to changes in the external environment. But it is equally true that for medium/large institutions the cohesion and collegiality in decisions should be stronger. Also, since the term 'governance' in the literature is a general concept and may be employed in a great variety of ways, an intensive verticalisation of university governance could be considered as a relatively 'friendly' structure that is found in many large-scale universities (Capano and Regini 2014; Middlerhurst 2013; Shattock 2013; Tandberg, 2010). However, based on the above examples, it seems that this was not the case in the changes of both systems as those changes were not limited to large-scale universities.

Nevertheless, any changes will alter, to a lesser or greater degree, academic institution members' behaviour, causing unavoidable implications in the decision making while the delegation of power, mainly among different single academic bodies, will increase the level of uncertainty. On the other hand, collegiality in university governance diminishes any resistance to decision making while it increases the acceptance of any change in the internal environment. In this way, academic members will be motivated for innovation and 'convinced' of the need for the decision, shaping the coherence and the collegiality around institutions' goals, inevitably leading the internal governance to a convergence in the attitudes and behaviours of all stakeholders (Ainscow, et.al. 2006; House 2000; Papa, et.al. 2013; Blinded for Review; Tandberg, 2010).

This study supports the view that no higher education system in the world can be considered as the 'best' system and that there is no one 'best practice' that all systems can follow to attain an optimal level of success. Higher education systems are dynamic, constantly in a state of change and seeking ways to improve. But any attempt to improve a system should be viewed together with the systems' particular characteristics, capacities and internal driving forces. That said, it is clear from the above that a lack of strategic planning, and any subsequent short-term solution, not

only struggles to bring improvement to the system but also makes it difficult to clearly identify what the system's orientation might be. The lack of policy cohesion and the regular occurrence of changes/reforms are counterproductive as universities often do not have enough time to adjust properly to the new policy environment before the next round of strategic imperatives are passed (Fassoulis 2014; Eckel, 2007 cited by de Haan, 2015; Hordern, 2013; Lokuwadage and Armstrong, 2015; Lanford, 2016; Lueger and Vettori, 2014; Ntim, Soobaroyen and Broad, 2017; Parker, 2013; Rowlands, 2013; Blinded for Review; Trakman, 2008; Volante and Ritzen, 2016; Vidovich and Currie, 2011)

Based on the above analysis in the countries targeted, the changes that occurred in the governance of Greek universities have brought the system closer to the English one by turning it towards a more managerial model of governance. The findings of this study indicate a centralisation of power and authority in Greek universities that often rests in the hands of single academic entities such as the Vice-Chancellor – a traditional habit in the internal structuring of Greek institutions. Evidently, the changes to the Greek system did not dramatically alter this key characteristic, namely, the concentration of power and authority at the top levels of an institution. Also, in Greece there is no distinction between who governs and who manages a university whereas in England it seems that those two aspects are treated separately. For this reason, the diminishing collegiality in decision making is more apparent in the English system due to the powers of governance being transferred to the hands of a single academic body. Despite the differences in the two systems, disturbances in the decision-making process can be found in both. Furthermore, there were pressures exerted by both national governments to bring about those changes.

Moreover, it seems that England is experimenting by seeking an alternative path for a more qualitative development of its higher education system whereas Greece is attempting to find the appropriate orientation that will bring the desired quality in its higher education system. The English experiment is through a more intensive focus on a market-driven approach with the emphasis on reviews and 'objective' qualitative criteria while in Greece the experimentation is through the implementation of different policy directives. Essentially, both countries have been tempted to experiment in order to identify a more optimal way of improving the quality of their higher education systems. However, the 'objective' is education and knowledge and there should be no room for experimentation in such a critical system. The higher education sector does not need experiments to develop further. Rather, it calls for caution, creativity and innovation so that higher education can increasingly provide solutions to national problems.

No matter the policy orientation of the system, higher education policy makers should not forget that higher education has a tremendous influence on peoples' attitudes and beliefs so the focus should be on the actual knowledge, on social responsibility and on the commitment of higher education to serve social interests and needs.

Conclusions

Based on the above analysis and on the two higher education systems under consideration, clearly there is no indicative recipe or prescription for quality assurance processes, whether it be in higher education or in any other sector. Aside from the differences in those systems' characteristics, all the relevant changes were implemented in the name of 'quality improvement'. This study acts as a complement to previous research on higher education governance since it develops further the analysis and the understanding of university governance. Certainly, the analysis developed in this study would benefit from a deeper exploration by investigating more numerous and diverse examples from the international arena of higher education. However, by using as examples two countries with different orientation in their higher education system (mainly due to differences in cultural and ideological perceptions) and keeping in mind that there is no ideal model for university governance, this study could enlighten decision makers in any country to develop a more effective and constructive model of university governance that would serve societal interests more effectively.

Considering that a) higher education is a public good and a social system while efficiency and equity should be at the core of an educational environment, b) universities are not enterprises, and c) though it may be impractical to enhance the building's capacity, it is quite possible to re-structure an institution to allow for "increasing the capacity of all members of the organisation to learn how to learn" (Reeves, et.al. 2002, p. 174), then the responsiveness of higher education institutions to increased competition and the enhancement of quality in the provision of educational services should be treated with extreme caution so as to safeguard equality in the system and the whole process of socialisation. This also demonstrates

 very clearly the importance of a coherent and communicative higher education policy,

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Introduction

A convergence in higher education policy would be facilitated by a wellestablished information network among the member states and a close monitoring of individual higher education systems. It appears that the factors capable of forcing a major change in the governance of higher education institutions focus not only on competitive pressures and the growth of universities (external strategies) but also on the integration and coordination of internal university policies and strategies into a coherent system of higher education for every member state. Despite any cultural, social or economic differences among countries, the process of globalisation aims, through common guidelines and interventions in the re-structuring of higher education institutions, to arrive at a common template of systemic governance (de Haan, 2015; Dobbins, 2015; Fassoulis 2014; Lazzeratti and Tavoletti, 2006; Lanford, 2016; Kickert 1997, cited by Capano and Regini 2014; Pandey, 2004; Tandberg, 2010; Van Vught, 1989; Wadhwa, 2016). Indeed, an underlying element of globalization is the utilization of education performance mechanisms such as indicators and tables, not only to emphasize the need for an improvement in the efficiency, quality and effectiveness of institutions but also to drive higher education to become more qualitative by leaning towards a key globalization principle: a common governance model.

The term 'governance' is a rather complex one as it is influenced by several factors related to human nature and to the conditions in which a country develops. Governance involves basic managerial functions, among which is the decision-making process – a function that is an inherent part of all other managerial functions. Decision making is a process that contributes to problem solving, where one of a set of alternatives is chosen with the aim of achieving organizational targets. According to many researchers (Altrichter, 2010; Beekes and Brown, 2006; Burley, Gnam, Newman, Straker and Babies, 2012; Cai and Mehari, 2015; de Haan, 2015; Lokuwadage and Armstrong, 2015; Lanford, 2016; Pandey, 2004; Tanberg, 2010; Worthington and Lee, 2008), governance is about making decisions on certain matters, mainly regarding the organization's structure, performance evaluation, the degree of autonomy and accountability of its members. Despite the complexity of the term, there are two key elements that are common in many interpretations, namely, the organization's structure and its targets & procedures. However, achieving

organizational targets certainly does not depend only on the rational and scientific coordination of all actions but also requires the willing cooperation of the organization's human resources. This collegiality and cooperation is based more on the ability of managers (those who have the ultimate responsibility for decisions) and less on scientific criteria. In other words, as a model/technique, 'governance' does not only depend on scientific criteria such as the analysis of statistics and other economic and technical variables but also on technical elements such as those required for motivating staff. Managerial aspects aside, governance can be considered as the "knowledge of how" a good result may be achieved, or as Barnard referred to it, the "knowledge of behavior" (Barnard, 1938, p. 290). The governance of organizations (including educational institutions) has a societal orientation since organizations are living organs operating within a given environment. (Altrichter, 2010; Burley, Gnam, Newman, Straker and Babies, 2012; Cai and Mehari, 2015; de Haan, 2015; Hordern, 2013; Lokuwadage and Armstrong, 2015; Lanford, 2016; Lueger and Vettori, 2014; Ntim, Soobaroyen and Broad, 2017; Parker, 2013; Rowlands, 2013; Trakman, 2008; Vidovich and Currie, 2011). The main aim of governance in an organization is to harmonize processes and to ensure the effective coordination and monitoring of its management activities.

With particular reference to the governance of higher education institutions, it is important to note that they are learning, interactive organizations whose main goal is to spread knowledge and thus influence society, either directly or indirectly (Altrichter, 2010; de Haan, 2015; Ntim, Soobaroyen and Broad, 2017; Pandey, 2004; Parker, 2013; Rowlands, 2013; Trakman, 2008; Vidovich and Currie, 2011). Hence, higher education institutions have a social responsibility and accountability towards society. On the other hand, cultural and historical features influence the preferred style/model of university governance. Indeed, the differentiation in university governance has roots in the national ideological, political and social culture within which higher education institutions operate. Although the character of university organizations is complicated and in many countries around the world can be characterized by a high degree of heterogeneity, public accountability is a common characteristic – not only towards society but also towards an organization's members (e.g. academic and administrative staff, students, etc.). For this reason, any university's governance model can be seen as a refined decision-making model, through which universities can respond appropriately and effectively to the challenges

(such as accountability and trust) that emerge through their role in the societal environment.

University governance in particular refers to the degree of managerial and economic autonomy that higher education institutions have as well as the degree to which any governance model influences academic freedom. Moreover, higher education institutions can be viewed as just another type of economic organization that deals with managerial challenges. That said, the economic dimension of universities should not interfere with their public duty, otherwise they may risk becoming "conventional organizations" (Spyridaki, 2008, p. 76) whose primary motivation is to seek out sources of funding, or even risk violating the principles of public accountability.

There are two dimensions to university governance: one concerns the management of universities and the other is purely their academic function. Any interference that involves bringing together the managerial and academic parts will result in dysfunctions. University governance is an interaction of several qualitative factors such as accountability, society, as well as the cultural and political environment. (de Haan, 2015; Lanford, 2016; Ntim, Soobaroyen and Broad, 2017; Parker, 2013; Rowlands, 2013; Trakman, 2008; Vidovich and Currie, 2011). It could be said that "internalized social and ideological conflicts at the same time reproduce internal ideological contradictions of the environment". (Edwards, Hulme and Wallace, 1999; Lewis, 2002, 2003; Spyridaki, 2008, p. 63). Within this framework, the successful achievement of universities' goals does not depend solely on the implementation of any particular model but rather on a strategy for a cooperative and collegial approach to the decision-making process, as well as a strategic target and mission for enhancing the role of universities in society.

Given that a) there have been increased pressures from external drivers to create a more marketized environment for higher education, b) university governance plays a significant role in the shaping of any improvements in higher education systems, and c) the widespread economic recession has brought abrupt changes to the economic and social forces in many countries worldwide, this study goes beyond existing comparative studies in the field since it analyzes the differences between two higher education systems that are quite distinct in terms of culture and ideology, namely, those of England and Greece. More specifically, case studies from each country are studied. No matter the background or the social or cultural forces that drive the changes in any system, education remains a fundamental sector that has a significant impact on peoples' attitudes, beliefs and values. Hence, any changes that occur in education will affect, to a great extent, not only the pure economy (in terms of employability) but also the quality of peoples' wellbeing.

This study used case studies from the selected countries mainly for the following reasons: a) in 2011 a new law related to Greek higher education governance was introduced (Greek Law 4009 /2011) and had brought changes in the governance of universities such as a decline in the power of the Senate, the entering of the council into, and the increased verticalization of, universities' decision-making processes, b) in 2011 English university governance had undergone a reform that had a great impact on the internal decision-making process with greater emphasis on the verticalization of the process, and c) in both countries those reforms have raised questions and debates around them. Moreover, despite the differences in the two systems, those reforms were introduced as a nationally-driven orientation strategy, with the English system being much more institutionally autonomous than the Greek one, which bows to central government pressures in a more verticalized governance model.

Based on the above, the purpose of this paper is:

- To investigate and assess the role played by university governance in the effectiveness and efficiency of higher education system through a) literature analysis and b) the management evaluation method of O and M (Organisation and Methods).
- To analyze, through the case studies of the two countries, the messages and the key ideas to be drawn from the recent reforms that occurred in the two systems and, together with feedback from the case studies, to make a strong case for further investigation into the relationship between university governance and the efficiency of the higher education system (mainly in terms of quality).
- By focusing on changes in internal governance that the two systems experienced and keeping in mind all the essential elements of higher education governance, to argue for a more radical change in, and greater scrutiny of, university governance so as to improve the efficiency and effectiveness of university operations and thus yield a more optimal satisfaction of social needs.

Research Methodology

The paper employs the technique of 'Organization and Methods' (the O and M technique) in order to investigate and assess the role played by university governance in the effectiveness and efficiency of the higher education system. This method is based on the analysis of answers to key questions such as "why is it done?" or "how is it done?" regarding the conduct of scientific observations and interviews with staff. An analysis of the responses helps the researcher to identify what is required to improve the system, both in terms of the management and efficiency of the system (Steele, 1987 cited by Blinded for Review)Using this method, and through the examination of two examples (case studies) of the governance of higher education institutions in Greece and England, the main aim of the paper is to analyze the role of university governance. The necessary information and data used in this study were obtained from a higher education institution in England and two universities in Greece. More specifically, the relative legislative framework, documents and reports relative to university governance were studied and discussions were held with academic and administrative staff of the relevant higher education institutions. Using these two examples (case studies) of the university governance system in the two countries, this study attempts to a) lessen the gap between theory and practice (Bassey, 2003) and b) point out key issues in the university governance systems using both a theoretical and a practical approach.

Research Results

Example 1: University Governance in England

Research Hypothesis: System of University Governance in Greece

Based on the O and M technique we could ask the following questions:

Research Question: "What is the current situation?"

Currently, in England the council is the principal governing body with the main managerial responsibilities for the university's financial and administrative issues. The council is also the body that employs all the university staff and appoints the Vice-Chancellor. Moreover, it is mainly responsible for monitoring the university business plan. Since this business plan also deals with academic issues, the general monitoring is carried out in cooperation with the Senate. The main responsibilities of the council are centred around the university's long-term and strategic plans, including key performance indicators to monitor the university's performance and establish evaluation methods for the effectiveness of the university. At the same time it ensures that the university will achieve the university's goals and aims while satisfying the needs and interests of the stakeholders involved.

The Senate is a collective body and has the supreme academic authority of the university. The Senate is responsible for the academic activities of the university and the promotion of its academic work in research, teaching and learning and all the related internal regulations, including those regarding the welfare, supervision and discipline of students. The Vice Chancellor of a university acts as the Chief Executive Officer of that university and his/her main responsibility is to implement university policies and strategies that will deliver the desired outcomes. Moreover, in order to assist the Vice Chancellor in his/her work, after consultation with the Senate, the institution's Council appoints the Provost, whose work is under the direction of the Vice Chancellor.

All those changes that happened in the English higher education system have their roots in changes to sources of funding while the orientation of the English system was for a closer alignment with the market.

According to the relevant literature (Capano and Regini 2014; Ferlie and Andresani 2009; Middlehurst 2013; Shattock 2013, etc.) English higher education has experienced a radical change in the governance model of universities by incorporating a new set of strategic and managerial incentives. It is known that English universities' academic programmes are fee-based while the structure of university funding is a mixture of State resources and other financial sources. Up to 2011, the number of students enrolled in English universities was controlled by the funding council while the proportion of State funding toward universities was the greatest. However, over the years the State's proportion of funding has gradually diminished while funding from research-based funds and other sources such as student loans have increased – a fact that has an impact on volatility in terms of university funding (Shattock 2013). This volatility of many English universities has led institutions to adopt a more hierarchical and managerial model of university governance whose main characteristics are the increased centralised, vertical decision-making (mainly in terms of finance) and a weakening of academic collegial power. This new strategy of

English universities has not altered their autonomy and their market-driven approach but has a significant impact on their internal governance.

Evaluation of the Case Report

England seems able to address the European higher education policy concerns and has proceeded in recent years with a round of changes based on a market-driven approach. In fact, since 1979 the English system has moved in a much more market-driven direction without losing its focus, which is to increase the role of the market in protecting the quality of higher education (Ahmed, Ahmed, Shimul and Zuniga, 2015; Brown and Carasso 2013; Capano and Regini 2014; Middlehurst, Goreham and Woodfield, 2009; Middlehurst and Texeira 2012; Ntim, Soobaroyen and Broad, 2017; Powel and Ozorhon 2012; Shattock 2013). However, it should be mentioned that, following Brexit, there may be repercussions for the higher education system, at least in the long term. In this regard, the main concern is how higher education institutions will be funded. Up to now, English higher education institutions have largely relied on students' fees for their main source of funding since the State contributes relatively little. Brexit may have a negative influence on such institutions, not least due to the expected increase in costs for students from outside the UK to study there, making them more difficult to recruit. As a result, and given that the higher education system in England is decentralised, the impact will most likely be on the decision-making process whereby the temptation will be to transfer funds from other sources, giving rise to a more business-oriented management system. Certainly these changes, if they materialise, may well prompt discussion and debate regarding the public nature of English Universities as they strive for greater competitiveness.

With regard to the enhancement of quality assurance, in 2011 English higher education policy makers announced their intention with the so-called 'White Paper Higher Education: Students at the Heart of the System' which set out a quality framework with a heavy underlying emphasis on the very close monitoring of institutional reviews and quality standards. With this reform/change the continued emphasis on a marketised approach to higher education is self-evident, underlining more strongly the principal value of the marketing strategy which is 'keep students (the customers) happy' (Marince and Gibbs, 2009). Using regular institutional reviews (See HEFCE 2012, cited by Brown and Carasso 2013) as its main tool, the State in England anticipates having better management control of institutions' volatility while at the same time being assured of having in place a regulative framework to protect quality in academic standards. The entrepreneurial approach of the English system also arises from the increased need of identifying alternative sources of finance for its higher education institutions. As a) the main source of State income is through taxation (direct and indirect), b) given the negative economic outlook of the past four years, the State has had limited financial resources with which to fund higher education, and c) even in a very simplified economic system, money has its cycle (people working, paying taxes and the State paying salaries to people), then the intention of the change in the English system may not be surprising. However, "if universities behave like ordinary commercial entities the continuation of these concessions (the relation between higher education and society) may be called into question." (Brown and Carasso 2013, p. 125).

Example 2: University Governance in Greece

Research Hypothesis: System of University Governance in Greece

Based on the O and M technique we could ask the following questions:

Research Question: "What is the current situation?"

As Greece is a member of the European Union, Greek higher education policy is influenced by changes that occur in the governance of European universities - English ones included. Indeed, although the United Kingdom recently decided to exit the European Union through a national referendum (Brexit), this action had not yet taken place at the time of writing and so the governance of higher education in English universities has continued in a fashion similar to that of other European Universities.

The goal of a coherent system of governance in universities has become a universal issue due to ongoing volatility in the global economy and the rising cost of higher education. It is the appropriate allocation of resources and a clear management structure that makes the system work more efficiently, thereby securing more productive and successful performance (Blinded for Review).

Within this framework, in 2011, the Greek Law 4009/2011 had brought changes to the governance of universities, such as a shift towards a more managerial type of governance, as well as the entering of the Council into, and the increased verticalization of, universities' decision-making processes. Indeed, since 2011 the Greek higher education system has been based on law 4009/2011, according to which the main bodies of the governance of a higher education institution are: the Council,

the Senate and Vice Chancellor. With particular reference to the Institutions' Council, it was first legislated through the Greek law 4009 / 2011 but appears to be more like a borrowed element from other higher education systems rather than an innovative change to the system. In accordance with this change, the Institutions' Council was made responsible for the general supervision of the institution. However, it should be mentioned that the Greek authorities recently took certain powers from the Council and assigned them to the Senate. As a result, in many Greek Universities the members of the Councils have been relieved of certain management duties and the Senate remains the upper most collective organ for decision making within Greek higher education institutions. In this situation, the relationship between universities and the State is critically important: it is possible for governments and their agencies to strongly influence universities and to limit their degree of autonomy. According to the Greek State, higher education is under the legal auspices of public law, which requires all university-level institutions to be self-governing. All these institutions primarily earn their income from taxation, supervised by the State, and are organized in line with specific laws that deal with their operations.

The Greek academic institutions are composed of faculties that are in turn divided into departments that constitute the basic academic unit. Each department is run by a general council that formulates teaching research policy and exercises control over all of the department's affairs. The Senate is responsible for activities such as the implementation of educational and research policy, ensuring the quality of the educational and research process, as well as ensuring that the law and the internal regulations are observed. The Vice Chancellor represents the institution and can participate in the Institutions' Council but has no right to vote. Among other duties, the Vice Chancellor has the higher responsibility of determining the annual budget and internal regulations. They can call for a Senate meeting to ensure the implementation of the decisions, they can announce vacancies for academic posts and also appoint academic staff.

If one considers that a) the economic recession gripping many countries in recent years has significantly impacted upon university funding, and b) the Greek State has been the dominant source of funding for universities while the country has been own severe economic recession for the past seven years, burdened with a cycle of economic debt that has had a direct negative impact on the funding of Greek universities, then a re-consideration of the overall framework of higher education governance by Greek policy makers is not surprising. Indeed, given the Greek State's diminishing financial support towards the higher education system as well as the continuously high educational expenditures, since the passing of the new law in 2011, Greek Higher education institutions are required to charge fees for their courses. This move by the Greek Central Authorities appears to be a response to external and worldwide pressures for a more market-oriented approach to university governance. Furthermore, insights from Greek educational literature (Fassoulis 2014; Blinded for review; Terzis 2010; Papadimitropoulos 2008; Papakonstantinou 2007; Zmas 2007; etc.) reveal that Greek educational policy (higher education in particular) has traditionally been influenced by other systems en route to any reform in education. The attempt to converge towards a more managerial type of university governance in Greece was certainly oriented, to a great extent, by common causes such as the economic recession. Although, by law, Greek universities are administrative selfgoverning organisations, their main source of funding is income through taxation (State funding) which is highly supervised by the State while organized in line with specific laws that deal with their operation (Blinded for review). Moreover, the main debate and discussion in the Greek higher education arena is the 'marketization of higher education' and the extent to which the labour market may be involved in the financing of universities. Indeed, due to cultural forces and ideologies about the higher education system, the greatest Greek academic fear of the higher education system is a market-driven approach to higher education.

Evaluation of the case report:

From the above, the slight orientation of the Greek system towards a more marketdriven approach is evident since, according to the new legislative framework (Greek law 4009 / 2011), at least at the postgraduate level, all programmes are required to charge fees for their postgraduate programmes. It should be mentioned at this point that since 1964 education in Greece, at all educational levels, has been free of charge while all State education institutions (which are the vast majority) have operated with financial support from the government and every citizen has equal educational opportunities, irrespective of family background, racial origin or gender.

With the introduction of Councils as academic bodies for the internal governance of Greek institutions, the orientation towards a more managerial model and the declining power of the Senate in the decision-making process (a totally new scenario for the

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Greek reality), the impact of the changes have been similar for Greece. These changes have brought disturbances not only to the institutions' governance and to the powers afforded to internal structures but also to the traditional disciplinary-based relationships.

Indeed, up until 2011 even the use of the word 'management' was almost forbidden in educational matters in Greece as this concept is widely considered to be the principal tool for monitoring performance and goal attainment in the entrepreneurial sector. But with the new framework, the concept not only entered into higher education but went beyond that, with the appointment (through an election process) of external members for a limited period of time in the synthesis of the Council (Fassoulis 2014). Although the changes that occurred in Greek universities' governance have brought the system closer to the English one by turning towards a more managerial model of governance, they did reveal a centralisation of power and authority in the hands of single academic bodies such as the Vice-Chancellor – a traditional habit in the internal structuring of Greek institutions – therefore the changes to the Greek system did not dramatically alter the main characteristic which is the centralisation of power and authority at the top levels of an institution. However, in Greece there is no distinction between who governs and who manages a university.

Another key factor in Greece's educational landscape is the culture and ideology of the Greek people which is very difficult to change. In view of the above, the passing of a law to adopt a fee-based system for postgraduate education was a small but significant move for Greece towards the market perspective. Within this framework, in order to develop its own strategy and 'best practice', Greece seems to have become accustomed to implementing a round of reforms/changes without, however, having a specific policy/direction, or a procedure to ensure that those changes would be implemented, or even a means of assessing whether or not the system has the capacity to respond to, and sustain, any planned changes. Indeed, many Greek educational researchers have converged on this conclusion, such as Fassoulis (2014), Lianos (2007), Papakonstantinou (2007), Papadimitropoulos (2008), Blinded for Review, and Zmas (2007).

Discussion

anic Co According to the above analysis, in practice, the changes in academic governance in both countries under consideration that resulted in a decrease in the

powers of the relevant academic bodies has led the education system towards a weakening of internal collegiality and cooperative spirit, with serious consequences for the decision-making process (Ahmed, Ahmed, Shimul and Zuniga, 2015; Fassoulis 2014; Ntim, Soobaroyen and Broad, 2017; Shattock 2013). Taking into consideration that changes are key components of higher educational policy in any country, both countries have been (and still are) seeking any changes that will ensure the sustainable development of the higher education system and also establish the framework within which all the relevant stakeholders should operate.

Designing a strategy for each country to materialise change is heavily dependent on the relationship between the State and its citizens as well as the degree of trust and certainty that has been built up over the years between them (Amaral, et.al. 2012; Blaschke, et.al. 2014; Fullan 2010; Hopbach 2012; Blinded for Review). Based on the latter, each country would require a range of different strategies to consider all the factors (which indeed are many and varied) that drive or affect change in order to achieve a so-called 'best practice'. Given that the individual factors, characteristics and dimensions of any reform/change for a particular country can influence their 'best practice', there can be no 'one-size-fits-all'of a best practice for all countries.

While it is true that a market-based approach may facilitate innovation and a greater responsiveness to the needs of all stakeholders involved, it is equally true that a collaborative and collegial institution culture is crucially important for its efficient and effective performance through maintained academic standards as it instills trust and reinforces academic bodies' initiatives that aim to satisfy stakeholders' needs (Altrichter, 2010; Brown and Carasso 2013; de Haan, 2015; Harvey 2008; Ntim, Soobaroyen and Broad, 2017; Pandey, 2004; Parker, 2013; Papa, et.al. 2013; Rowlands, 2013; Shattock 2013; Trakman, 2008; Vidovich and Currie, 2011). However, given that not a single market has perfect information flow (symmetry), then the marketization of higher education may be diminishing the collegiality in the decision-making process. Certainly, the timing of information is not so important in the education sector, as 'no one has or can have the information that would enable them to make the same judgements about quality and suitability that they might make about a physical product or a less complex service' (Brown and Carasso 2013, p. 124).

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The market orientation strategy, based on the fundamental principle of marketing, may indeed have a positive impact on the enhancement of the qualitative process since the increased competition among the institutions will force them to improve in order to maintain/enhance their position and consequently attract more students, both in terms of quantity and quality. However, the whole discussion and debate is not around commercial goods or services but it is about education services – a sector completely different from the business sector in terms of attitude and values (Altrichter, 2010; Antikainen, 2010 cited by de Haan, 2015; Burley, Gnam, Newman, Straker and Babies, 2012; Cai and Mehari, 2015; Capano and Regini 2014; de Haan, 2015; Eckel, 2007 cited by de Haan, 2015; Hordern, 2013; Lokuwadage and Armstrong, 2015; Lanford, 2016; Lueger and Vettori, 2014; Marince and Gibbs 2009; Ntim, Soobaroyen and Broad, 2017; Papa, et.al. 2013; Parker, 2013; Rowlands, 2013; Trakman, 2008; Volante and Ritzen, 2016; Vidovich and Currie, 2011). One could consider that the business sector aims to enhance quality so as to attract more customers and increase economic potential. However, its fundamental aim is to make a profit. Certainly this is not the case in the education sector. While a reduction in commercial standards may not necessarily create substantial problems, any lowering of academic standards, or a reduction in the 'real' quality of knowledge, or inflated grades in academic degrees, would inflict serious damage to society and pose many difficulties in restoring that damage (Brown and Carasso 2013; Marince and Gibbs 2009; Middlehurst 2013; Middlehurst, Goreham & Woodfield, 2009; Parker, 2013; Rowlands, 2013; Salter and Tapper, 2000; Trakman, 2008; Vidovich and Currie,). Therefore, the market-based policy should be handled with the utmost caution.

As academic governance entails responsibility and is a social process, its significance is heavily dependent on an institution's structure. Any change in the internal structure calls for an investigation and reconsideration of management's accountability – the role of the bodies (both collective and single) in terms of the monitoring institution's performance and responsiveness regarding all stakeholders' needs and interests. According to many English educational researchers such as Hogan (2012), Middlehurst (2013), and Shattock (2013), the English higher education landscape, at least over the last decade, includes 'a mania' (Shattock 2013, pp. 225) of restructuring institutions' internal organisation. This restructuring was actually a top-down process that was not only limited to institutions but went beyond, to the synthesis of bodies which in their present form have members from 'outside' the

university, appointed for a limited time period within which the agreed aims of the institution should be met. The net impact, however, has been an erosion of the climate of cooperation and mutual understanding among the academic community. Indeed, previous work has shown that top-down communication obstructs the flow of information and thus impedes an institution's responsiveness to the real problems (Lanford, 2016; Lueger and Vettori, 2014; Middlehurst 2013; Blinded for Review; Pandey, 2004; Starbuck 2014; Tanberg, 2010; Wadhwa, 2016). This is happening because the lower levels of the academic community do not have the opportunity to express their ideas and problems or to communicate their needs and aspirations.

Indeed, as many researchers rightly recognize that higher education institutions act as learning organizations, they see creativity and collective governance to be two key elements that contribute significantly to the promotion of social good (Eckel, 2007; Antikainen, 2010 cited by de Haan, 2015). Academic autonomy and status cannot be associated with the funding of universities since any connection with the financial policy of the university may undermine public accountability and harm the trust relationship with societal groups. University governance is open to the external environment and should respond to any rapid changes in that environment. That said, higher education institutions should be governed within a strategic framework so that under no circumstances would they respond spontaneously to environmental changes purely for financial gain. Hence, a key issue in university governance is that universities respond effectively to environmental challenges while maintaining public accountability as a top priority.

In the countries targeted, the diminishing collegiality in decision making is more apparent in the English system due to the powers of governance being transferred to the hands of a single academic body. In Greece, on the other hand, the Vice-Chancellor had retained power in decision making but with Greek law 4009/2011 the authority for decision making was delegated to the Council, thereby reducing the power of the Senate. Despite the differences between the two systems, interference in the decision-making process can be found in both. Furthermore, there were pressures exerted by both national governments to bring about those changes.

One argument regarding the decision-making process is that the size of the organisation plays a key role in the effectiveness of a decision (Papalewis and Fortune 2002; Shattock 2013; Starbuck 2014). Indeed, it is true that a relatively stable organisation structure is a key element of successful decision making, especially for a

medium/large-sized organisation with a strategy planning system, since such institutions are more vulnerable to changes in the external environment. But it is equally true that for medium/large institutions the cohesion and collegiality in decisions should be stronger. Also, since the term 'governance' in literature is a general concept and may be employed in a great variety of ways, an intensive verticalisation of university governance could be considered as a relatively 'friendly' structure that is found in many large-scale universities (Capano and Regini 2014; Middlerhurst 2013; Shattock 2013; Tandberg, 2010). However, based on the above examples, it seems that this was not the case in the changes of both systems as those changes were not limited to large-scale universities.

Nevertheless, any changes will alter, to a lesser or greater degree, academic institution members' behaviour, causing unavoidable implications in the decision making while the delegation of power, mainly among different single academic bodies, will increase the level of uncertainty. On the other hand, collegiality in university governance diminishes any resistance to decision making while it increases the acceptance of any change in the internal environment. In this way, academic members will be motivated for innovation and 'convinced' of the need for the decision, shaping the coherence and the collegiality around institutions' goals, inevitably leading the internal governance to a convergence in the attitudes and behaviours of all stakeholders (Ainscow, et.al. 2006; House 2000; Papa, et.al. 2013; Blinded for Review; Tandberg, 2010).

According to the case studies of the two countries, the changes that took place in the English system, such as an over-reliance on institutions' reviews, academic standards and the use of performance indicators for the enhancement of the qualitative process, are also among the changes that occurred in the Greek one, while the impact and the consequences of those changes on the university governance, such as diminished collegiality in the decision making process and imbalances in the internal power structure, again are the same in both systems. Moreover, the roots of those changes such as the economic recession and the need for alternative sources of finance for universities are also common in both systems under consideration. A key distinction, though, between the two systems is that in English higher education the governance changes are being implemented as a transitional step while this is not the case in Greece.

Moreover, it should be mentioned that when a system, such as the English one, has traditionally been conceived from a market perspective, then simply intensifying the existing approach is not likely to bring radical consequences because the system would already have been tested for its suitability and sustainability. In addition, before applying any changes to the system, a country should analyse its capacity to implement such changes. The latter is of considerable importance in any discussion on proposed changes since it must be clarified whether or not the systems have the capacity or even the potential to accommodate all the implications of such changes before a more dynamic path to growth and development is pursued. Simply imitating certain characteristics of other higher education systems and enforcing their implementation without even a period of transition certainly does not ensure any improvement in university governance or an appropriate approach for the desired outcome. In the case of the English higher education system, despite the fact that it was already accustomed to the market-driven approach and had proceeded to an even more intensive marketing perspective regarding the university governance model, still it is in a state of transition.

This study supports the view that no higher education system in the world can be considered as the 'best/ system and that there is no one 'best practice' that all systems can follow to attain an optimal level of success. Higher education systems are dynamic, constantly in a state of change, seeking ways to improve. But any attempt to improve a system should be viewed together with the systems' particular characteristics, capacities and internal driving forces. However, it is clear from the above that the lack of strategic planning while, by implementing short-term solution, it not only struggles to bring improvement to the system but also makes it difficult to clearly identify what the system's orientation might be. The lack of policy cohesion and the regular occurrence of changes/reforms are counterproductive as universities often do not have enough time to adjust properly to the new policy environment before the next round of strategic imperatives are passed (Fassoulis 2014; Eckel, 2007 cited by de Haan, 2015; Hordern, 2013; Lokuwadage and Armstrong, 2015; Lanford, 2016; Lueger and Vettori, 2014; Ntim, Soobaroyen and Broad, 2017; Parker, 2013; Rowlands, 2013; Blinded for Review; Trakman, 2008; Volante and Ritzen, 2016; Vidovich and Currie, 2011)

The case studies selected show that there are countries who are tempted to experiment in order to identify a more appropriate path towards the qualitative

development of its higher education system. However, the 'objective' is education and knowledge and there is no room for experimentation in the system. The higher education sector does not need experiments to develop further. Rather, it deserves cautious, creative and innovative consideration and needs a very distinctive treatment of national problems.

No matter the policy orientation of the system, higher education policy makers should not forget that higher education has a tremendous influence on peoples' attitudes and beliefs so the focus should be on the actual knowledge, on social responsibility and on the commitment of higher education to serve social interests and needs.

Conclusions

Based on the above analysis and on the two higher education systems under consideration, clearly there is no indicative recipe or prescription for quality assurance processes, whether it be in higher education or in any other sector. Aside from the differences in those systems' characteristics, all the relevant changes were implemented in the name of 'quality improvement'. This study acts as a complement to previous research on higher education governance since it develops further the analysis and the understanding of university governance. Certainly, the analysis developed in this study would benefit from a deeper exploration by investigating more numerous and diverse examples from the international arena of higher education. However, by using as examples two countries with different orientation in their higher education system (mainly due to differences in cultural and ideological perceptions) and keeping in mind that there is no ideal model for university governance, this study could enlighten decision makers in any country to develop a more effective and constructive model of university governance that would serve societal interests more effectively.

Considering that a) higher education is a public good and a social system while efficiency and equity should be at the core of an educational environment, b) universities are not enterprises, and c) though it may be impractical to enhance the building's capacity, it is quite possible to re-structure an institution to allow for "increasing the capacity of all members of the organisation to learn how to learn" (Reeves, et.al. 2002, p. 174), then the responsiveness of higher education institutions to increased competition and the enhancement of quality in the provision of

educational services should be treated with extreme caution so as to safeguard <text><text><text><text> equality in the system and the whole process of socialisation. This also demonstrates very clearly the importance of a coherent and communicative higher education policy, one that would avoid the human inclination to 'change for the sake of change'. As Shattock (2013, p. 232) put it 'the system which is able to resist such pressures is likely to emerge with a more distinctive academic culture and a better academic product'.

Though the 'sirens' from the political arena are usually many, in view of the above, universities should raise their voices to state their case for greater autonomy and ultimately to promote greater social justice.

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Introduction and Aims of the Study

The European Union's educational policy, based mainly on the Lisbon Treaty, has attempted to focus the educational policies of member states towards a 'new governance model' of higher education institutions that would facilitate the process of adjusting to the wave of globalisation and continuous change occurring in the global social and economic environment (Capano and Regini 2014; Fassoulis 2014, etc.). A convergence in higher education policy would be facilitated by a well-established information network among the member states and a close monitoring of individual higher education systems. It appears that the factors capable of forcing a major change in the governance of higher education institutions focus not only on competitive pressures and the growth of universities (external strategies) but also on the integration and coordination of internal university policies and strategies into a coherent system of higher education for every member state. Despite any cultural, social or economic differences among countries, the process of globalisation aims, through common guidelines and interventions in the re-structuring of higher education institutions, to arrive at a common template of systemic governance (Fassoulis 2014; Neave and van Vught 1991; Kickert 1997), cited by Capano and Regini 2014). Indeed, an underlying element of globalisation is the utilization of education performance mechanisms such as indicators and tables, not only to emphasize the need for an improvement in the efficiency, quality and effectiveness of institutions but also to drive higher education to become more qualitative by leaning towards a key globalisation principle: a common governance model.

According to the relevant literature (Capano and Regini 2014; Ferlie and Andresani 2009; Middlehurst 2013; Shattock 2013, etc.) English higher education has experienced a radical change in the governance model of universities by incorporating a new set of strategic and managerial incentives. It is known that English universities' academic programmes are fee-based while the structure of university funding is a mixture of State resources and other financial sources. Up to 2011, the number of students enrolled in English universities was controlled by the funding council while the proportion of State funding toward universities was the greatest. However, over the years the State's proportion of funding has gradually diminished while funding from research-based funds and other sources such as student loans have increased – a fact that has an impact on volatility in terms of university funding (Shattock 2013). This volatility of many English universities has led institutions to adopt a more hierarchical and managerial model of university governance whose main characteristics

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are the increased centralised, vertical decision-making (mainly in terms of finance) and a weakening of academic collegial power. This new strategy of English universities has not altered their autonomy and their market-driven approach but has a significant impact on their internal governance.

Greece on the other hand, as a member of the European Union, has certainly not been the exception to the rule. Greek higher education policy has been influenced by those changes which occurred in the governance of English universities. If one considers that a) all those changes that happened in the English higher education system have their roots in changes to sources of funding, b) changes in funding and the increase in volatility were oriented by the economic recession that many countries worldwide (including England) have been facing in recent years, and c) the Greek State has been the dominant source of funding for universities while the country has been facing a severe economic recession for the past four years, burdened with a cycle of economic debt that has had a direct negative impact on the funding of Greek universities, then a re-consideration of the overall framework of higher education governance by Greek policy makers is not surprising. Furthermore, insights from Greek educational literature (Fassoulis 2014; Blinded for review; Terzis 2010; Papadimitropoulos 2008; Papakonstantinou 2007; Zmas 2007; etc.) reveal that Greek educational policy (higher education in particular) has traditionally being influenced by other systems en route to any reform in education. The attempt to converge towards a more managerial type of university governance in Greece was certainly oriented, to a great extent, by common causes such as the economic recession. However, given the lack of financial support from the Greek State for the higher education system and the continuous high educational expenditures, the differences between the two systems (Greek and English) are evident. Although, by law, Greek universities are administrative self-governing organisations, their main source of funding is income through taxation (State funding) which is highly supervised by the State while organized in line with specific laws that deal with their operation (Blinded for review). Moreover, the main debate and discussion in the Greek higher education arena is the 'marketisation of higher education' and the extent to which the labour market may be involved in the financing of universities. Indeed, due to cultural forces and ideologies about the higher education system, the greatest Greek academic fear of the higher education system is the market-driven approach of higher education, which is certainly not the case for the English system. So the main differences between the two systems are clear.

This study was undertaken mainly for the following reasons: a) in 2011 (Greek Law 4009 /2011) a new law related to Greek higher education governance was introduced and had brought changes in the governance of universities such as a decline in the power of the Senate, the entering of the council into, and the increased verticalisation of, universities' decision-making processes, b) in 2011 English university governance had undergone a reform that had a great impact on the internal decision-making process with greater emphasis on the verticalisation of the decision process, and c) in both countries those reforms have raised questions and debates around them. Moreover, despite the differences in the two systems, those reforms were introduced as a nationally-driven orientation strategy, with the English system being much more institutionally autonomous than the Greek one, which bows to central government pressures in a more verticalised governance model.

Although there have been studies concerning the changes that occurred in the English higher education system, such as Capano and Regini 2014; Ferlie and Andresani 2009; Middlehurst 2013; Shattock 2013; etc, there have been few studies addressing the changes implemented in the Greek system. In particular, to our knowledge there has been only one literature review study on the governance of Greek higher education institutions – that of Fassoulis (2014). Moreover, it appears there has been no comparative study between these two particular systems after the recent changes in university governance, the increased pressures from external drivers to create a more marketised environment for higher education, and after the widespread economic recession that has brought abrupt changes to the economic and social forces of both countries (with the impact on the Greek higher education system being felt more acutely).

Given the significant differences between the two higher education systems, the differences in cultural forces of the two countries as well as the challenging and intriguing reforms that the two systems have undergone recently, the purpose of this paper is, based on literature review and a comparative overview of the two systems, to analyse the messages and the key ideas to be drawn from the recent reforms that occurred in the two systems. Moreover, by focusing on internal governance changes that the two systems experienced, and keeping in mind all the essential elements of higher education governance, this paper argues for a more radical change in, and greater scrutiny of, university governance so as to improve the efficiency and effectiveness of university operations and thus yield a more optimal satisfaction of social needs.

Description of the Greek Governance of Higher Education Institutions

Since 2011 the Greek higher education system has been based on law 4009 / 2011, according to which the main bodies of the governance of a higher education institution are: the Council, the Senate and Vice Chancellor. The Greek academic institutions are composed of faculties that are in turn divided into departments that constitute the basic academic unit. Each department is run by a general council that formulates teaching research policy and exercises control over all of the department's affairs.

With particular reference to the Institutions' Council, it was first legislated through the Greek law 4009 / 2011 but appears to be more like a borrowed element from other higher education systems rather than an innovative change to the system. In accordance with this change, the Institutions' Council was made responsible for the general supervision of the institution. It consists of 11 or 15 members (depending on the size of the institution) whereas 7 or 9 members are internal academic members at the academic level of Professor or Associate Professor, and one representative from the undergraduate students. The remaining 4 or 6 members are external academics (from outside the institution). In the first step of the process, the internal members are elected from among all the academic members of the institution whereas the external members are elected from among the elected internal members based mainly on qualitative criteria such as a broad recognition of society, of science, of the arts, a good international reputation, as well as knowledge and experience of managerial issues. The council has the authority to:

- undertake the general supervision and control of an institution;
- implement the institution's strategy for development at local, national and international level;
- ✤ approve the internal regulations and also make amendments;
- take initiatives to link the institution with society and the economy;
- determine the main pathways of the institutions' development;
- approve the annual regular economic budget and the annual financial planning of the institution;

- approve the assessments of any activities on the budget;
- suspend the head of the faculties from their duties;
- ensure the Greek law is observed;
- * and decide upon the fees the institutions can charge for postgraduate programmes after consulting the relevant faculties. It should be mentioned, though, that the Greek Ministry of Education (the State) requires the Greek higher education institutions to establish an organization plan (in terms of internal regulation) which is to be submitted by the end of 2014.

With particular reference to the Vice Chancellor of a Greek higher education institution, their role it to manage and supervise the institution. After an international invitation from the Institutions' Council, those who are interested send their full CV to the Council which then selects from among those the candidates for the position of Vice Chancellor for a four-year term. The election process for the position of Vice Chancellor is the responsibility of the Council and, after the candidates are selected, invites them for an open meeting with the academic community of the institution. Within two days of this open meeting, the academic members of the institution have to elect the Vice Chancellor. After the Vice Chancellor is elected, he/she then appoints Associate Vice chancellors to assist them in their work. The Vice Chancellor represents the institution and can participate in the Institutions' Council but has no right to vote. Among other duties, the Vice Chancellor has the higher responsibility of determining the annual budget and internal regulations. They can call for a Senate meeting to ensure the implementation of the decisions, they can announce vacancies for academic posts and also appoint academic staff.

With particular reference to the Senate, which is a collective body, it consists of the Vice Chancellor, Faculty heads and heads of departments (up to two from each faculty and with a two-year term, until all heads of the departments are members of the Senate). There is also a representative from the undergraduate students, from the postgraduate students and from the PhD candidates of the whole institution (a one-year term with no potential reelection as a representative). Finally, there is a representative from each administrative category but they are present at Senate meetings only when administrative issues are to be discussed.

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The Senate is responsible for activities such as the implementation of educational and research policy, ensuring the quality of the educational and research process, as well as ensuring that the law and the internal regulations are observed.

- It approves the financing of educational, training and development projects,
- approves the execution of projects mainly in the direction of life-long education and training,
- approves the bodies of internal and external reviewers for the election/promotion of academic staff,
- ✤ approves all the undergraduate curricula,
- can make decisions regarding cooperation with other universities in terms of establishing new academic programmes,
- make suggestions to the Council and to the Vice Chancellor regarding the institutions' internal regulations, and suggest changes to the faculties, the institutions' planning and the assignment of activities to other bodies.

It is worth mentioning that there is no clear statute on how many meetings the Council and the Senate can/should make throughout the academic year. Both the Council and the Senate are called for a meeting by the Head (or the President) of the Council and the Vice-Chancellor accordingly, whenever there are issues to be discussed.

Description of the Governance of Higher Education Institutions in England

Currently, in England the council is the principal governing body with the main managerial responsibilities for the university's financial and administrative issues. Moreover, it is mainly responsible for monitoring the university business plan. Since this business plan also deals with academic issues, the general monitoring is carried out in cooperation with the Senate. The council meets up to five times throughout an academic year and consists of 25 members (full membership), the majority of whom are external to the university and mainly come from the business world and local authorities. The idea behind this membership is that those who participate in the institution's council are people with diverse qualifications and experience from which the university can benefit.

The council is also the body that employs all the university staff and appoints the Vice-Chancellor. The main responsibilities of the council are centred around the university's long-term and strategic plans, including key performance indicators to monitor the university's performance and establish evaluation methods for the effectiveness of the university. At the same time it ensures that the university will achieve the university's goals and aims while satisfying the needs and interests of the stakeholders involved. It approves the university's annual budget as it is the principal financial and business authority of the university while it also approves any possible changes in the University Statutes. Moreover, it delegates power to the Vice Chancellor regarding managerial issues on both financial and human resource matters.

The Senate is a collective body and has the supreme academic authority of the university. The Senate is responsible for the academic activities of the university and the promotion of its academic work in research, teaching and learning and all the related internal regulations, including those regarding the welfare, supervision and discipline of students. The Senate is chaired by the Vice-Chancellor and consists of 46 internal academic members elected by the Faculty Boards and the Assembly while it also includes three representatives from among the undergraduate students. The main activities of the Senate centre around the setting of the academic quality standards; making regulations on teaching and learning issues such as determining which courses of study can be accepted from another institution; granting degrees, etc.; making recommendations to the council regarding academic issues such as the establishment of Faculties; the appointment of the academic staff; the establishment of new academic posts in the university; etc. The Senate meets up to five times each year while issues discussed in each meeting arise mostly from the Senate Committees whose main responsibility is to make recommendations to the Senate concerning items of business arising from other lower-level academic bodies.

Finally, the Vice Chancellor of a university acts as the Chief Executive Officer of that university and his main responsibility is to implement university policies and strategies that will deliver the desired outcomes. Moreover, in order to assist the Vice Chancellor in his/her work, after consultation with the Senate, the institution's Council appoints the Provost, whose work is under the direction of the Vice Chancellor.

Discussion

While this study is a comparative one between two systems with significant differences not only in purely systemic terms but also in terms of culture and ideology, it goes beyond purely summarising the differences between the two systems. That said, no matter the background or the social or cultural forces that drive the changes in any system, education remains a fundamental sector that has a significant impact on peoples' attitudes, beliefs and values. Hence, any changes that occur in education will affect, to a great extent, not only the pure economy (in terms of employability) but also the quality of peoples' wellbeing.

Taking into consideration that changes are key components of higher educational policy in any country, both countries have been (and still are) seeking any changes that will ensure the sustainable development of the higher education system and also establish the framework within which all the relevant stakeholders should operate. Designing a strategy for each country to materialise change is heavily dependent on the relationship between the State and its citizens as well as the degree of trust and certainty that has been built up over the years between them (Amaral, et.al. 2012; Blaschke, et.al. 2014; Fullan 2010; Hopbach 2012; Blinded for Review). Based on the latter, each country would require a range of different strategies to consider all the factors (which indeed are many and varied) that drive or affect change in order to achieve a so-called 'best practice'. Given that the individual factors, characteristics and dimensions of any reform/change for a particular country can influence their 'best practice', there can be no 'one-size-fits-all'of a best practice for all countries.

Within this framework, in order to develop its own strategy and 'best practice', Greece seems to have become accustomed to implementing a round of reforms/changes without, however, having a specific policy/direction, or a procedure to ensure that those changes would be implemented, or even a means of assessing whether or not the system has the capacity to respond to, and sustain, any planned changes. Indeed, many Greek educational researchers have converged on this conclusion, such as Fassoulis (2014), Lianos (2007), Papakonstantinou (2007), Papadimitropoulos (2008), Blinded for Review and Zmas (2007). England, on the other hand, seems more able to address the European higher education policy concerns and has proceeded in recent years with a round of changes based on a market-driven approach. In fact, since 1979 the English system has moved in a much more market-driven direction without losing the focus which is to increase the role of the market in protecting the

quality of higher education (Brown and Carasso 2013; Capano and Regini 2014; Middlehurst and Texeira 2012; Powel and Ozorhon 2012; Shattock 2013).

With regard to the enhancement of quality assurance, in 2011 English higher education policy makers announced their intention with the so-called 'White Paper Higher Education: Students at the Heart of the System' which set out a quality framework with a heavy underlying emphasis on the very close monitoring of institutional reviews and quality standards. With this reform/change the continued emphasis on a marketised approach to higher education is self-evident, underlining more strongly the principal value of the marketing strategy which is 'keep students (the customers) happy' (Marince and Gibbs 2009). Using regular institutional reviews (See HEFCE 2012, cited by Brown and Carasso 2013) as its main tool, the State in England anticipates having better management control of institutions' volatility while at the same time being assured of having in place a regulative framework to protect quality in academic standards.

The market orientation strategy, based on the fundamental principle of marketing, may indeed have a positive impact on the enhancement of the qualitative process since the increased competition among the institutions will force them to improve in order to maintain/enhance their position and consequently attract more students, both in terms of quantity and quality. However, the whole discussion and debate is not around commercial goods or services but it is about education services – a sector completely different from the business sector in terms of attitude and values (Capano and Regini 2014; Marince and Gibbs 2009; Papa, et.al. 2013). One could consider that the business sector aims to enhance quality so as to attract more customers and increase economic potential. However, its fundamental aim is to make a profit. Certainly this is not the case in the education sector. While a reduction in commercial standards may not necessarily create substantial problems, any lowering of academic standards, or a reduction in the 'real' guality of knowledge, or inflated grades in academic degrees, would inflict serious damage to society and pose many difficulties in restoring that damage (Brown and Carasso 2013; Marince and Gibbs 2009; Middlehurst 2013). Therefore, the market-based policy should be handled with the utmost caution.

The entrepreneurial approach of the English system also arises from the increased need of identifying alternative sources of finance for its higher education institutions. As a) the main source of State income is through taxation (direct and indirect), b) given the negative economic outlook of the past four years, the State has had limited financial

resources with which to fund higher education, and c) even in a very simplified economic system, money has its cycle (people working, paying taxes and the State paying salaries to people) then the intention of the change in the English system may not be surprising. However, "if universities behave like ordinary commercial entities the continuation of these concessions (the relation between higher education and society) may be called into question.." (Brown and Carasso 2013, p. 125).

Within this framework, the slight orientation of the Greek system towards a more market-driven approach is evident since, according to the new legislative framework (Greek law 4009 / 2011), at least at the postgraduate level, all programmes are required to charge fees for their postgraduate programmes. It should be mentioned at this point that since 1964 education in Greece, at all educational levels, has been free of charge while all State education institutions (which are the vast majority) have operated with financial support from the government and every citizen has equal educational opportunities, irrespective of family background, racial origin or gender. Another key factor in Greece's educational landscape is the culture and ideology of the Greek people which is very difficult to change. In view of the above, the passing of a law to adopt a fee-based system for postgraduate education was a small but significant move for Greece towards the market perspective. In comparison, the orientation of the English system was for a closer alignment with the market.

While it is true that a market-based approach may facilitate innovation and a greater responsiveness to the needs of all stakeholders involved, it is equally true that a collaborative and collegial institution culture is crucially important for its efficient and effective performance through maintained academic standards as it instills trust and reinforces academic bodies' initiatives that aim to satisfy stakeholders' needs (Brown and Carasso 2013; Harvey 2008; Papa, et.al. 2013; Shattock 2013). However, given that not a single market has perfect information flow (symmetry), then the marketization of higher education may be diminishing the collegiality in the decision-making process. Certainly, the timing of information is not so important in the education sector, as 'no one has or can have the information that would enable them to make the same judgements about quality and suitability that they might make about a physical product or a less complex service' (Brown and Carasso 2013, p. 124).

No doubt the English and Greek policymakers had the best of intentions. However, in practice, the changes in academic governance in England and Greece that resulted in a decrease in the powers of the relevant academic bodies has led the education system towards a weakening of internal collegiality and cooperative spirit, with serious consequences for the decision-making process (Fassoulis 2014; Shattock 2013).

As academic governance entails responsibility and is a social process, its significance is heavily dependent on an institution's structure. Any change in the internal structure calls for an investigation and reconsideration of management's accountability – the role of the bodies (both collective and single) in terms of the monitoring institution's performance and responsiveness regarding all stakeholders' needs and interests. According to many English educational researchers such as Hogan (2012), Middlehurst (2013), and Shattock (2013), the English higher education landscape, at least over the last decade, includes 'a mania' (Shattock 2013, pp. 225) of restructuring institutions' internal organisation. This restructuring was actually a top-down process that was not only limited to institutions but went beyond, to the synthesis of bodies which in their present form have members from 'outside' the university, appointed for a limited time period within which the agreed aims of the institution should be met. The net impact, however, has been an erosion of the climate of cooperation and mutual understanding among the academic community. Indeed, previous work has shown that top-down communication obstructs the flow of information and thus impedes an institution's responsiveness to the real problems (Middlehurst 2013; Blinded for Review; Starbuck 2014). This is happening because the lower levels of the academic community do not have the opportunity to express their ideas and problems or to communicate their needs and aspirations.

With the introduction of Councils as academic bodies for the internal governance of Greek institutions, the orientation towards a more managerial model and the declining power of the Senate in the decision-making process (a totally new scenario for the Greek reality), the impact of the changes have been similar for Greece. These changes have brought disturbances not only to the institutions' governance and to the powers afforded to internal structures but also to the traditional disciplinary-based relationships.

Indeed, up until 2011 even the use of the word 'management' was almost forbidden in educational matters in Greece as this concept is widely considered to be the principal tool for monitoring performance and goal attainment in the entrepreneurial sector. But with the new framework, the concept not only entered into higher education but went beyond that, with the appointment (through an election process) of external members for a limited period of time in the synthesis of the Council (Fassoulis 2014), as in the English system. Although the changes that occurred in Greek universities' governance have brought the system closer to the English one by turning towards a more managerial model of governance, they did reveal a centralisation of power and authority in the hands of single academic bodies such as the Vice-Chancellor – a traditional habit in the internal structuring of Greek institutions – therefore the changes to the Greek system did not dramatically alter the main characteristic which is the centralisation of power and authority at the top levels of an institution. However, in Greece there is no distinction between who governs and who manages a university whereas in England it is clear that those two aspects are treated separately. For this reason, the diminishing collegiality in decision making is more apparent in the English system due to the powers of governance being transferred to the hands of a single academic body. In Greece, the Vice-Chancellor had retained power in decision making but with Greek law 4009 /2011 the authority for decision making was delegated to the Council, reducing the power of the Senate. Despite the differences in the two systems, the disturbances in the decision-making process can be found in both. Furthermore, there were pressures from both national governments to bring about those changes.

One argument regarding the decision-making process is that the size of the organisation plays a key role in the effectiveness of a decision (Papalewis and Fortune 2002; Shattock 2013; Starbuck 2014). Indeed, it is true that a relatively stable organisation structure is a key element of successful decision making, especially for a medium/large-sized organisation with a strategy planning system, since such institutions are more vulnerable to changes in the external environment. But it is equally true that for medium/large institutions the cohesion and collegiality in decisions should be stronger. Also, since the term 'governance' in literature is a general concept and may be employed in a great variety of ways, an intensive verticalisation of university governance could be considered as a relatively 'friendly' structure that is found in many large-scale universities (Capano and Regini 2014; Middlerhurst 2013; Shattock 2013) . However, it seems that this was not the case in the changes of both systems as those changes were not limited to large-scale universities.

Nevertheless, any changes will alter, to a lesser or greater degree, academic institution members' behaviour, causing unavoidable implications in the decision making while the delegation of power, mainly among different single academic bodies, will increase the level of uncertainty. On the other hand, collegiality in university governance diminishes any resistance to decision making while it increases the acceptance of any change in the internal environment. In this way, academic members will be motivated for innovation and 'convinced' of the need for the decision, shaping the coherence and the collegiality around institutions' goals, inevitably leading the internal governance to a convergence in the attitudes and behaviours of all stakeholders (Ainscow, et.al. 2006; House 2000; Papa, et.al. 2013; Blinded for Review).

The changes that took place in the English system, such as an over-reliance on institutions' reviews, academic standards and the use of performance indicators for the enhancement of the qualitative process, are also among the changes that occurred in the Greek one, while the impact and the consequences of those changes on the university governance, such as diminished collegiality in the decision making process and imbalances in the internal power structure, again are the same in both systems. Moreover, the roots of those changes such as the economic recession and the need for alternative sources of finance for universities are also common in both systems. A key distinction, though, between the two systems is that in English higher education the governance changes are being implemented as a transitional step while this is not the case in Greece.

Moreover, the major difference between the two systems in terms of the adoption of a market approach is that the English system has traditionally been based on fees so an intensive approach on the already established market perspective would not bring radical consequences because the system has already being tested for the implementation and the sustainability of this approach. The Greek system on the other hand, due to the 'sense of urgency' not only to catch up with the European Union's policy but also to satisfy creditors' demands for the country's financing debt, had not been tested in its capacity to implement such a change (Fassoulis 2014; Grigiriadis and Kamaras 2012; Blinded for Review). The latter is considerably important in any discussion on those changes since it must be clarified whether or not the systems have the capacity or even the potential to meet their own needs when following a qualitative path of the change process to enhance growth and development. Simply imitating certain characteristics of other higher education systems and enforcing their implementation without even a period of transition certainly does not ensure any improvement in university governance or an appropriate approach for the desired outcome. In the case of the English higher education system, despite the fact that it was already accustomed to the market-driven approach and had proceeded to an even more intensive marketing perspective regarding the university governance model, still it is in a state of transition.

This study supports the view that no higher education system in the world can be considered as the 'best/ system and that there is no one 'best practice' that all systems can

follow to attain an optimal level of success. Higher education systems are dynamic, constantly in a state of change, seeking ways to improve. But any attempt to improve a system should be viewed together with the systems' particular characteristics, capacities and internal driving forces. Certainly we do not claim that the English system is better than the Greek one or that the Greek system should follow the example of the English one, as both systems have advantages and disadvantages. However, it is clear from the above that the Greek higher education system lacks strategic planning while, by implementing short-term solutions (due to the regular changes) it not only struggles to bring improvement to the system but also makes it difficult to clearly identify what the system's orientation might be. Indeed, it has been mentioned earlier in the text that in England, regardless of changes in political power, the higher education policy direction and orientation remains the same, which is not the case in Greece. The lack of policy cohesion and the regular occurrence of changes/reforms (as with the Greek system) are counterproductive as universities often do not have enough time to adjust properly to the new policy environment before the next round of strategic imperatives are passed (Fassoulis 2010; Grigoriadis and Kamaras 2012; Blinded for Review; Terzis 2010; Zmas 2007).

Based on the above analysis it seems that England is experimenting in order to find the appropriate path towards the qualitative development of its higher education whereas Greece is attempting to find the appropriate orientation so as to bring the desired quality into its higher education process. The experimentation in the English system is through a more intensive focus on a market-driven approach and the emphasis on reviews and 'objective' qualitative criteria while in Greece the experimentation is through the implementation of different policy directions. However, since in both cases the 'objective' is education and knowledge, there is no room for experimentation in the system. The higher education sector does not need experiments to develop further. Rather, it deserves cautious, creative and innovative consideration and needs a very distinctive treatment of national problems.

No matter the policy orientation of the system, higher education policy makers should not forget that higher education has a tremendous influence on peoples' attitudes and beliefs so the focus should be on the actual knowledge, on social responsibility and on the commitment of higher education to serve social interests and needs.

Conclusions

Based on the above analysis of the two higher education systems, clearly there is no indicative recipe or prescription for the quality assurance processes, whether it be in higher education or in any other sector. Aside from the differences in those systems' characteristics, all the relevant changes were implemented in the name of 'quality improvement'.

Considering that a) higher education is a public good and a social system while efficiency and equity should be at the core of an educational environment, b) universities are not enterprises, and c) though it may be impractical to enhance the building's capacity, it is quite possible to re-structure an institution to allow for "increasing the capacity of all members of the organisation to learn how to learn" (Reeves, et.al. 2002, p. 174), then the responsiveness of higher education institutions to increased competition and the enhancement of quality in the provision of educational services should be treated with extreme caution so as to safeguard equality in the system and the whole process of socialisation. This also demonstrates very clearly the importance of a coherent and communicative higher education policy, one that would avoid the human inclination to 'change for the sake of change'. As Shattock (2013, p. 232) put it 'the system which is able to resist such pressures is likely to emerge with a more distinctive academic culture and a better academic product'.

caden. f many, in. greater autonon. Though the 'sirens' from the political arena are usually many, in view of the above, universities should raise their voices to state their case for greater autonomy and ultimately to promote greater social justice.

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