

Internationalisation of (External) Quality Assurance in the European Higher Education Area

Main trends and developments

Background paper to the BFUG WG 2 (Implementation),
9-10 November 2016, Nice

1. Setting the scene – internationalisation of quality assurance

As a regulatory activity in most EHEA countries, quality assurance has been traditionally characterised by a strongly national mandate and national priorities. At the same time, European ministers for higher education highlighted the international dimension of QA in their various Bologna follow-up communiqués. With the adoption of the Standards and Guidelines for Quality Assurance in the European Higher Education Area (the ESG) in 2005, internationalisation has become an integral part of the work of QA agencies. Indeed, the trend to internationalise has clearly increased in the past few years.

Establishing internal and external quality assurance systems in line with the ESG is one of the “key commitments” identified by the Bologna Follow-Up Group in March 2016, and described as key to the EHEA's success. According to a report prepared for the BFUG AG3 (Non-Implementation), 28 EHEA countries have satisfactorily implemented that key commitment.

While the existence of the ESG as such already internationalises quality assurance and while the ESG recommend (in a guideline, not a standard) involving international experts in QA, there are trends and policy commitments by EHEA ministers that represent further steps in internationalising QA. These steps go beyond the key commitment.

ENQA carried out a survey of QA agencies in 2014-2015 in the framework of its 4th Quality Procedures Project (QPP), focusing on the internationalisation and international activities of QA agencies. Perhaps unsurprisingly, one of the findings was that there was no single shared profile of how agencies internationalise. However, it became clear that international activities have increased in the past decade and that certain features and elements of internationalisation have been particularly important to the agencies.

1. One key element of internationalisation is of course that, since 2005, agencies base (increasingly) their standards and criteria on **a set of international standards** – the ESG.
2. Using the same shared framework for external quality assurance has increased the need for and importance of sharing good practice and experiences between agencies. In this perspective, the **different international networks** (European, sub-regional, methodology-based, subject-specific, etc.) have become to be seen as the primary forum for internationalisation by most European QA agencies.
3. One specific outcome of engagement in networks is the involvement of agencies in **different international and European projects** on specific issues and theme related to quality assurance of higher education.
4. In addition, in terms of “internationalisation at home”, we can observe that agencies are

more and more interested to **involve foreign experts** in the external review panels, and – though to a lesser degree – in the governing bodies of the agencies.

5. Carrying out **external quality assurance (EQA) abroad**, either in partnership or “alone”, as discussed below

The Bologna Process has been surely a strong motivating factor and enabling framework for the internationalisation of quality assurance in Europe. From the perspective of the Bologna Process, there are three specific dimensions of internationalisation of QA that are particularly relevant, namely:

- Cross-border quality assurance activities of QA agencies
- Quality assurance of joint programmes, in particular the use of the European Approach
- Quality assurance of cross-border higher education/transnational education

The next sections will address each of these specifically, outlining the state of the art, as well as the key issues that will need to be addressed to ensure their proper implementation. It is important that the members of the working group, and subsequently the BFUG, discuss how to enable the HEIs and QA agencies – and thus the entire HE systems – to reap the benefits of the different forms of internationalisation of quality assurance, while minimising the possible associated risks.

2. Cross-border quality assurance

The policies adopted in the Bologna Process/EHEA context have supported external quality assurance (EQA) activities crossing borders, not least by the adoption of the ESG, forming a common ground for work across border. Furthermore, over the last years, the wish of an increasing number of higher education institutions to be evaluated or accredited by a European agency or by an agency from another country has also led to an increase in cross-border evaluations and accreditations independent of the EHEA policy developments.

2.1 Rationales for cross-border QA

EQAR analysed the phenomenon of cross-border external quality assurance in detail as part of the RIQAA (Recognising International Quality Assurance Activity in the EHEA) project. The RIQAA Final Report (2014) describes that quality assurance agencies have expanded their international activities, in order to broaden their own experience and international presence. ENQA's 4th QPP confirmed that, while by no means a significant area of activity for all agencies, providing external quality assurance across borders has become relevant activity for some agencies in Europe.

At the same time, higher education institutions are keen to take advantage from the opportunities of an international quality assurance review, as discussed in the RIQAA report: assessment by an agency most suited to their own profile, valuable feedback, a genuinely international experience and increasing international reputation.

Even though cross-border external quality assurance is a reality in almost all EHEA countries, it often takes place in parallel to the obligatory, national external quality assurance arrangements. For institutions, this often means an unproductive duplication of efforts.

2.2 Monitoring and state of play

During the past years, EQAR has monitored the development of national legal frameworks as well as the cross-border activities of registered agencies. The RIQAA project had noted that cross-border EQA was often done “ad hoc” and did not always follow a clearly defined and

consistent set of processes and criteria. For the years 2014 and 2015, EQAR monitored specifically whether agencies consistently published reports on their cross-border QA activities, as required by the ESG. While some gaps could be identified in the publication practice of agencies, the monitoring and subsequent contact with agencies have led to a consistent publication of full reports.

In 2015, the cross-border QA activities of half of EQAR-registered agencies spanned across 41 different higher education systems, of which 24 in EHEA and 17 beyond EHEA. 209 of the cross-border EQA procedures were carried out at programme level, while 44 EQA at the higher education level (see Illustration 1).

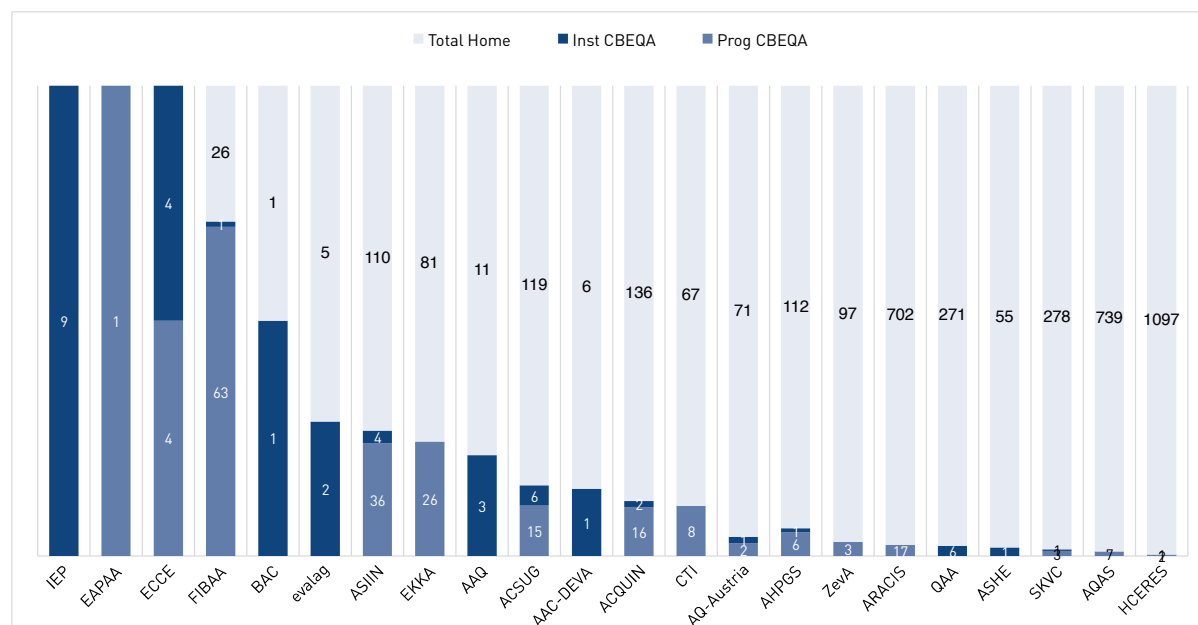


Illustration 1: EQA activities of EQAR-registered QAAs across borders

Recognising EQAR-registered agencies as part of the national requirements for external QA

Recognising foreign agencies with own/specific framework

Discussions ongoing

EQA by foreign agencies not recognised

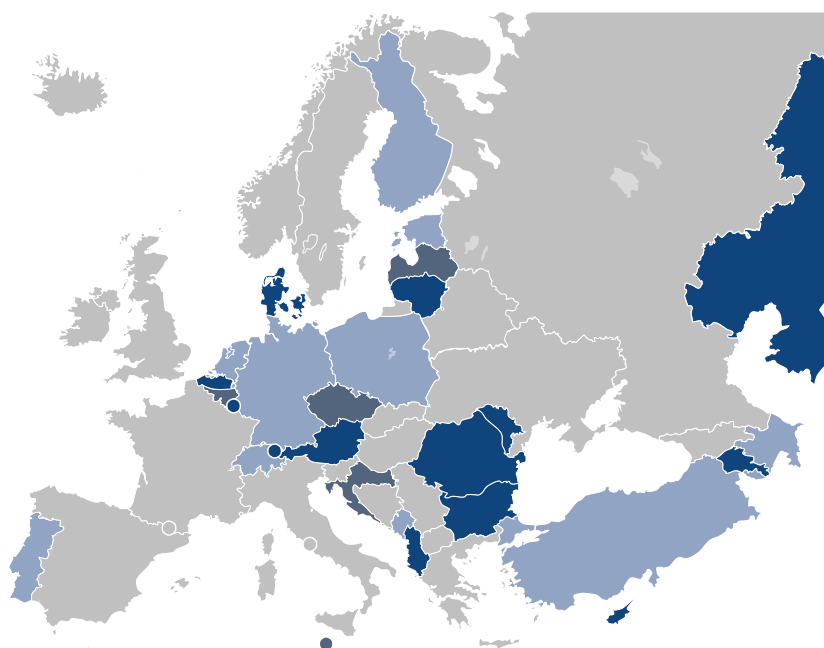


Illustration 2: Recognition of cross-border EQA in national legal frameworks

While cross-border QA activities are actually taking place in most EHEA countries, only 15 countries (31% of EHEA) have put in place legal provisions to allow (all or some) higher education institutions to have accreditation, evaluation or audit from suitable EQAR-registered agencies recognised as part of the obligatory, national external quality assurance system (see Illustration 2).

2.3 Key considerations for cross-border QA

Following up the recommendations from the RIQAA project, EQAR and the E4 Group (ENQA, ESU, EUA, EURASHE) agreed to discuss further the key issues that should be taken into consideration when planning cross-border quality assurance activities. An E4 and EQAR ad-hoc working group developed a set of “key considerations” for cross-border QA.

While reaffirming that the ESG are the basis for all QA in the EHEA, and thus also for cross-border QA, the document aims to support and inspire higher education institutions and QA agencies that engage in, or consider engaging in, cross-border QA activities. The key considerations (here annexed) will be discussed with participants at this year’s European Quality Assurance Forum (EQAF) in Ljubljana (Slovenia).

These considerations may also be useful for governments in reviewing their legal frameworks with a view to allowing their institutions to make use of a suitable EQAR-registered agency in fulfilling the requirements of national mandatory QA.

2.4 Key questions

1. Have you discussed the recognition of EQA by suitable EQAR-registered agencies at national level? What are the views of different stakeholders?
2. Do you think that the ESG and EQAR's existing monitoring instruments, supplemented by the Key Considerations, are a sound framework for cross-border QA?
3. What are the main questions arising in your national framework?
4. Is there a need for further guidance addressing governments specifically and, if so, in which areas?
5. What are the good practices you have encountered? What are the risks and challenges you have encountered?

2.5 References

- [RIQAA Final Report \(2014\)](#)
- [ENQA Quality Procedures Project](#) (2015)
- [Key Considerations for Cross-Border Quality Assurance](#) (draft)

3. Quality assurance of joint programmes

3.1 Background

Joint programmes are a hallmark of the EHEA. They are not an end in themselves, but aim to enhance the mobility of students and staff, to facilitate mutual learning and cooperation opportunities, to create programmes of excellence and to offer a genuine European learning experience to students. Yet, the implementation of joint programmes is still hampered by serious problems, many of them related to different legal frameworks and regulations across the countries in which the programme is offered.

While external quality assurance (QA) is only one of several challenges, especially in those countries where programmes have to be approved by accreditation bodies or ministries, different national legislation and formal criteria represent one major obstacle. Such specific and sometimes contradictory national requirements inhibit cooperation in the development of joint programmes.

Even though ministers committed “to recognise quality assurance decisions of EQAR-registered agencies on joint and double degree programmes” (Bucharest Communiqué 2012), the full recognition of single external quality assurance procedures remained limited.

Consequently, an often met practice are several, fragmented external QA processes – each looking at the bits and pieces of the joint programme in one country, thus neglecting the joint character of the joint programme.

3.2 European Approach

Over the years, QA agencies and stakeholders developed and tested various integrated approaches to external QA of joint programmes, reflecting their joint character (see Background Report). These have demonstrated that the ESG, the Qualifications Framework for the European Higher Education Area (QF-EHEA) and the European Credit Transfer and Accumulation System (ECTS) together form a sound basis for QA of joint programmes.

In Yerevan (2015), ministers adopted the European Approach for Quality Assurance of Joint Programmes: it defines standards that are based on the agreed tools of the EHEA, without applying additional national criteria. This should facilitate integrated approaches to quality assurance of joint programmes, in internal as well as external QA, which genuinely reflect and mirror their joint character.

The European Approach differs in nature from the ESG (and many other EHEA tools): while it is envisaged that the ESG are implemented through appropriate legislation, processes and criteria, but not necessarily used directly, the European Approach is designed to be used directly: i.e. quality assurance agencies should use the agreed procedure and apply the agreed standards, without translating them into their own rules, and without additions or modifications. Likewise, higher education institutions can use the European Approach directly in their internal quality assurance approach. Would countries or agencies change or add additional requirements to the agreed standards, the European Approach would fail.

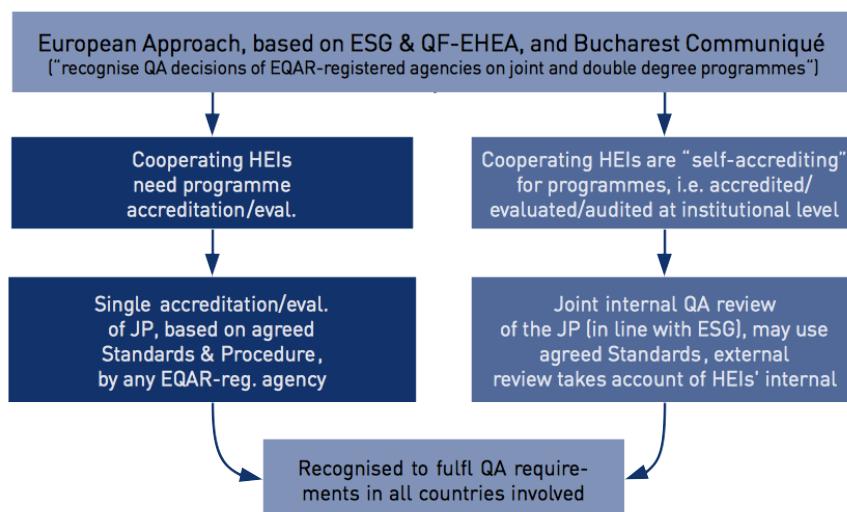


Illustration 3: Application of the European Approach

Illustration 3 shows the application of the European Approach in different contexts.

3.3 Implementation in practice

Feedback received in various seminars and events shows that there is keen interest in using the European Approach – both from institutions and agencies. Programmes mainly welcome the integrated approach and hope for increased visibility through using the European Approach.

While no specific translation or “transposition” of the European Approach into national rules is needed, it is a political agreement and not a legally binding one. The pre-condition for its use is thus that EHEA countries allow the use of the agreed European Approach in their national legislation, i.e. to recognise external quality assurance in line with the European Approach as sufficient to fulfil the external QA obligations.

In November 2015, a peer-learning seminar organised by the Spanish Ministry of Education, Culture and Sport was dedicated to the quality assurance of joint programmes. The outcomes welcomed the European Approach as a generic approach for the EHEA, and underline the need for ministries to facilitate and allow its application. The outcomes also stress that the European Approach is to be implemented by quality assurance agencies and higher education institutions directly, as it stands, and that there is thus no need to wait for a “blueprint” or a further “operationalisation” before using it.

Since the adoption of the European Approach in May 2015, a few countries made specific decisions to recognise its use (e.g. Germany, Netherlands). Discussions are ongoing or legislative changes are being drafted in additional countries (e.g. Croatia, Slovenia). In some countries the European Approach can be used following existing regulations for the recognition of EQAR-registered agencies' decisions (e.g. Denmark).

Finally, in a few EHEA countries some or all higher education institutions are subject to obligatory external quality assurance at the institutional level only (i.e. they are “self-accrediting” their programmes). They may thus choose to use the European Approach in their internal QA arrangements, which should be recognised in their institutional audit or accreditation.

Illustration 4 provides an overview of the current ability to use the European Approach by country.

All higher education institutions are able to use the European Approach to satisfy national QA requirements

■ through recognition of single external quality assurance procedure for programmes

■ by virtue of HEIs being self-accrediting

Some higher education institutions are able to use the European Approach, or use is subject to specific conditions

Discussions ongoing

Cannot be used to satisfy national QA requirements

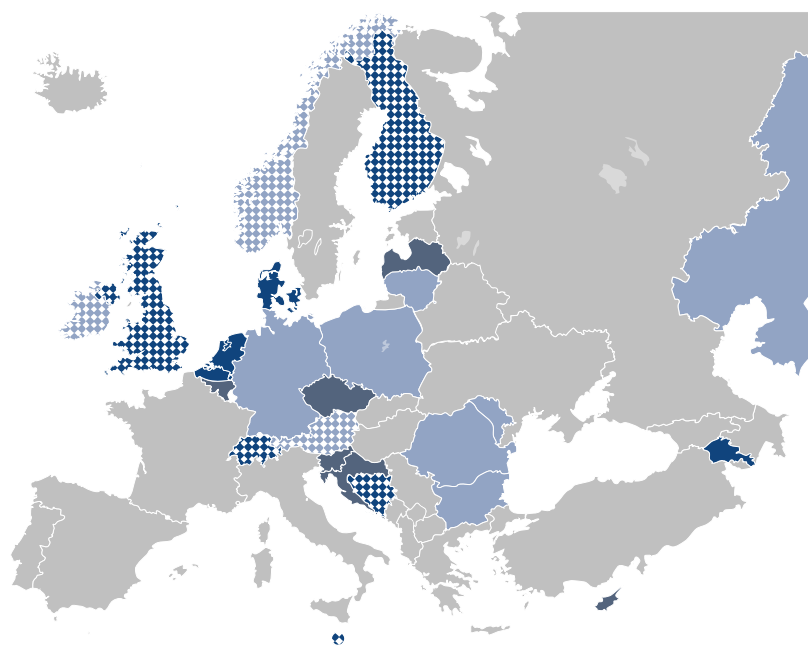


Illustration 4: Availability of the European Approach for QA of Joint Programmes

In early 2016, the programme International Teacher Education for Primary Schools (ITEPS, offered by Stenden University of Applied Sciences, the Netherlands, University College Zealand, Denmark, and University College of Southeast Norway) became the first programme to be accredited based on the European Approach, by the Accreditation Organisation of the Netherlands and Flanders (NVAO).

3.4 Key questions

1. What have been the reactions by the different stakeholders in your country to the adoption of the European Approach?
2. How interested are HEIs in your country in using the European Approach?
3. Can the European Approach be used according to your legislation? If not, what steps have you taken? What obstacles did you encounter?
4. Is there a need for more guidance or support? If so, in what area?

3.5 References

- [European Approach for Quality Assurance of Joint Programmes](#)
- [Background Report \(August 2014\)](#)
- [Outcomes of the Salamanca PLA \(November 2015\)](#)

4. Quality assurance of cross-border education

In 2013 ENQA launched an EU co-funded project on quality assurance of cross-border higher education. The QACHE-project looked closely into different ways in which European quality assurance agencies and higher education institutions (HEIs) address the accreditation and quality assurance of programmes delivered outside their countries, exploring good practice, specifically in terms of cooperation between host and home country QA agencies. The project produced a comprehensive final report with detailed country reports for France, Germany, Spain, and the UK, as well as a Toolkit for CBHE providers and QA agencies.

The project attempted to fill a gap in information on quality assurance of CBHE. In addition, through the suggested collaborative approaches between agencies, the project also wished to find a way to lighten the QA burden on exported HE, and to set up mechanisms to avoid situations where a programme might fall into a “QA gap”, i.e. not be reviewed by any agency, in the home or the host country. The project was one step in responding to a strongly perceived need to enhance the national and international supervision of CBHE, which is still at the moment very fragmented and diverse, while also ensuring that the processes do not become prohibitively burdensome (or contradictory) to the institutions involved. The QACHE Toolkit suggests a framework in which HEIs and systems could more fully harness the opportunities offered by CBHE while avoiding some of the most serious challenges and shortcomings, such as sub-standard provision, failure to match host and home country objectives, and the duplication of procedures.

The QACHE project's focus was on the quality assurance of programmes and institutions exported from Europe to countries outside of Europe. While in the European context the ESG, EQAR, and the European Approach for QA of Joint Programmes constitute a solid framework (when they will be fully implemented) for recognition of QA decisions, and allow thus for a higher degree of trust and lesser duplication of processes for HE providers (see the EU Council Conclusions on quality assurance supporting education and training of May 2014), the situation is naturally more complex when quality assuring higher education between world regions. This said, the QACHE project's recommendations to national level policy makers have relevance

also in relation to CBHE within the EHEA. Indeed, the project outcomes underline the important role that national governments may have in supporting the development of adequate frameworks for this purpose. Some specific recommendations of the QACHE project that seem highly relevant also in the EHEA context include the following:

- Governments should collect and disseminate information on CBHE offered by the institutions in the higher education system and on the quality assurance (both internal and external) that is in place.
- Governments should support QA agencies in the development of national capacities for the QA of CBHE and inter-agency cooperation for this purpose.
- Governments should facilitate the development of regular and reliable data collection systems for inbound and outbound CBHE at the national level.
- Governments should engage in a dialogue with the QA agencies to identify and review any unnecessary regulatory restrictions that hinder efficient and effective quality assurance of CBHE, and the related inter-agency cooperation. E.g. recognition of QA procedures and decisions by EQAR registered agencies for any programmes (imported, exported or ordinarily provided within a country) would be an important step in this direction.
- Ensure that QA of CBHE meets the requirements of the ESG and is in line with the OECD/UNESCO Guidelines for Quality Provision in CBHE.

4.1 Key questions

1. Acceptability of principle of country of origin ensuring QA in line with ESG as sufficient?

4.2 References

- [QACHE project final report](#)
- [QACHE Toolkit](#)
- [UNESCO/OECD Guidelines for Quality Provision in Cross-border Higher Education](#)