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## Final Report

### **INPUT STUDY TO THE REPORT FROM THE EUROPEAN COMMISSION ON PROGRESS IN THE DEVELOPMENT OF QUALITY ASSURANCE SYSTEMS IN THE VARIOUS MEMBER STATES AND ON COOPERATION ACTIVITIES AT EUROPEAN LEVEL**

in the context of EAC 02-2010 (lot 3) Framework service contract  
prepared by the research team from



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## GLOSSARY OF TERMS

EC	European Commission
ECTS	European Credit Transfer and Accumulation System
EHEA	European Higher Education Area
EI	Education International
ENIC- NARIC	European Network of Information Centres - National Academic Recognition Information Centres
ENQA	European Association for Quality Assurance in Higher Education
EQA	External Quality Assurance
EQAF	European Quality Assurance Forum
EQAR	European Quality Assurance Register for Higher Education
EQF	European Qualifications Framework for Lifelong Learning
ESG	Standards and Guidelines for Quality Assurance in the EHEA
ESU	European Students' Union
EU	European Union
EUA	European Universities Association
EURASHE	European association of Higher Education Institutions
HE	Higher Education
HEI	Higher Education Institution
IQA	Internal Quality Assurance
LOs	Learning Outcomes
NQF	National Qualifications Framework
NUS	National Union of Students
QA	Quality Assurance
QAA	Quality Assurance Agency
QF-EHEA	Qualifications Frameworks in the European Higher Education Area
QFs	Qualifications Frameworks

## 1. EXECUTIVE SUMMARY

The present Study aims to identify progress in the development of quality assurance (QA) systems in various Member States and QA cooperation activities at European level with respect to the „Recommendation of the European Parliament and of the Council on further European cooperation in quality assurance in higher education” (2006/143/EC) and the first triennial report on progress in QA in Higher Education (HE) presented by the European Commission in 2009. The Study explores current trends, achievements, good practices, weaknesses and future challenges to European QA systems and cooperation. It also provides recommendations on further development at EU, national, quality assurance agencies (QAAs) and higher education institutions’ (HEIs) level.

The study is qualitative in nature and based on a combination of comprehensive desk research, analysis of BFUG survey data and consultations of leading figures in European QA in HE, notably those from the E4 Group (EUA, ENQA, EURASHE and ESU) and the two, out of three, organisations identified in the Bucharest Communiqué (Business Europe and EQAR). In addition, an online survey among EQAR-registered agencies was undertaken to shed light on the extent and type of their international activities, as well as on their views regarding benefits and challenges of being an internationally active QAA, reasons for EHEA countries not to recognise foreign EQAR-registered agencies and perspectives on the further internationalisation of QA.

### **On the European policy level, integration of QA with other Bologna action lines has come to the fore and a revision of the ESG is carried out by the E4 in cooperation with other stakeholders**

The main trend of the last years regarding QA policies on the European level seems to be the integration of different Bologna action lines. There is a growing awareness that QA cannot be considered independently of other areas and trends in HE. The missing link to Bologna tools, especially learning outcomes (LOs) and Qualification Frameworks (QFs) has been increasingly seen as problematic for the „Standards and Guidelines for Quality Assurance in the EHEA” (ESG/Standards and Guidelines). Since the establishment of the ESG in 2005, the European QA landscape has changed considerably. Consequently, the need to revise the document has become apparent. The MAP-ESG project, launched in 2010 by the E4 has gathered information and stakeholders views on the implementation and application of the Standards and Guidelines and started the discussion on its revision, indicating areas for improvement. In the 2012 Bucharest Communiqué, the ministers committed to revise the ESG to improve their clarity, applicability and usefulness, including scope. Comprehensive revision is currently carried out, based on the findings and conclusions of the MAP-ESG project, by the E4, EQAR, EI and BUSINESS EUROPE. The revised ESG are to be adopted at the next Ministerial Conference in 2015.

### **Internal Quality Assurance (IQA) systems are developing, the challenge remains for them to become integrated in academic practice**

Since 2009, developments of IQA have gained significant momentum. Member States have encouraged HEIs to implement IQA systems through formal requirements, however rarely making explicit reference to the ESG, the adoption of part 1 of the Standards and Guidelines was largely ensured through EQA, whereas various European and national level incentives, projects and organisations, as well as peer influence and international aspirations of HEIs acted as a driver for IQA developments. Consequently, since 2009 the idea of an IQA system has gained ground and been widely accepted among and within HEIs across EHEA. Recent developments go beyond IQA systems, changing the emphasis towards quality cultures that are about academic values and bottom-up processes.

Generally it can be concluded, that European HEIs have established or developed IQA structures and processes, which take into account aspects of the ESG. Systems completely in line with the Standards and Guidelines are still a minority. In 2012, only 11 of 25 national student unions considered that in their countries part 1 of the ESG was fully applied, while also suggesting that the degree of compliance varies significantly not only among EHEA countries, but also within national HE systems. The reasons behind inconsistent ESG implementation are manifold and reflect the complexity of frameworks in which IQA systems operate, including the fact that the ESG have often been implemented in HEIs indirectly through compliance with EQA. The ESG may not yet have become the single „common framework” for HEIs

across Europe, but they have had an unprecedented impact on harmonising QA at institutional level and fostering a shared, European understanding of IQA.

In the past few years, IQA within European institutions has become more systematised and consistent. Students participation is now taken for granted, although the degree and practices of their involvement differ across EHEA. The role of external stakeholders has increased, nevertheless their systematic and meaningful engagement remains challenging. Closing feedback loops and regular evaluations of learning resources and student support services are seen as weaknesses of IQA. The biggest challenge has not changed since 2009 and is still how to ensure that IQA encourages genuine engagement of the academic community and development of a strong quality culture. So far, QA is still often regarded more as a top-down and administrative task rather than the heart of the matter for academics.

Finally, it must be stated, that the most profound impact on IQA in the recent years came along with the need to design curricula from a student perspective with LOs and ECTS as main pillars. Most HEIs managed to define LOs for their programmes but implementing this new approach into the teaching and learning process and aligning it with IQA systems remains a great challenge.

### **External Quality Assurance (EQA) is aligning itself with the ESG, however, much remains to be done**

Regarding EQA, it can be said that all EHEA countries have some form of EQA system in place, although significant differences in the philosophy and approach behind systems persist. Since the Bologna Process was launched, 22 countries have established national QAAs, with half of these being set up since 2005 (Eurydice, 2010). 11 countries in the EHEA do not have established QAAs. These include those with a small HE sector, e.g. Andorra, Liechtenstein, Luxembourg and Malta, which organise EQA and international participation in other ways, such as admitting foreign QAAs. In a few countries, e.g. Denmark, Portugal, and Italy, new agencies have replaced or built on the existing ones (EACEA 2012, p. 60). In Ireland, Austria France and Belgium agencies have merged. In Moldova, a new agency is currently being founded.

Most EQA focuses on the teaching and learning area and programme level accreditation procedures are still the most common form of EQA. There is a trend that HE systems start with a QA system focusing on supervision and ensuring minimum standards, which then evolves towards a more improvement-oriented approach. There are thus developments towards more institutional, „light touch” and enhancement-oriented QA systems, primarily in more „mature” QA systems acting in compliance with the ESG. The transition from a programme-oriented to an institution-oriented approach is often gradual, through the step-wise introduction of institutional elements (e.g. „systems’ accreditation” in Germany, institutional reviews in Flanders). Among European QAAs and other stakeholders, there is a growing understanding that QA must be integrated with the other Bologna action lines such as recognition, QFs, and LOs. Indeed, in several European countries, the focus of QA is shifting away from input-centred criteria and teachers’ activities towards intended LOs and assessments, achieved LOs and student experiences. In some countries even accreditation moves beyond a mere confirmation of compliance with minimal standards and places growing value on LOs. QAAs have also seen their missions broaden to include additional dimensions such as the social dimension, lifelong learning or internationalisation. Some stakeholders from QAAs, however, often perceive that this orientates quality assurance more towards policy priorities which in their view makes the balance between quality enhancement and accountability more difficult to reconcile. Taking into account the legally binding power of QA, it comes as little surprise that EQA is seen by HEIs as the most influential driver for change as evidenced by the last TRENDS Report.

Agency compliance with the ESG, as evidenced by their membership in ENQA or EQAR, has grown considerably. As of March 2013, there are 39 full members in ENQA, compared to 31 full members in 2009, which results in a 26% increase in membership over the last three years. EQAR membership has grown from 9 in 2010 to 32 in 2013. 27 EHEA countries (57%) still have no member agency in ENQA and 32 EHEA countries (68%) have no member agency in EQAR, which suggests that the ESG may have still not been fully implemented in a number of countries since 2009.

For agencies, full compliance against the ESG part III varies according to the individual standards. Standards 3.2 (Official status) and 3.3 (Activities) present agencies with the fewest challenges, however besides those two, no other Standard has been met by more than 68% of ENQA-reviewed agencies.

Nearly all agencies publish some form of assessment results, but their depth and detail varies greatly. Accordingly, transparency and understandability of assessment reports (if they are published) is often still unsatisfactory. The majority of QAAs themselves is evaluated on a regular basis but IQA of agencies most often remains informal. Independence of agencies is a difficult criterion in practice since no agency is ever in a position of complete legal or financial autonomy. An area that has further improved since 2009 is stakeholder participation in EQA. While there is still room for improvement, stakeholder participation in QA, in particular the involvement of students, is increasingly being seen as one of the key elements of the „European approach” to QA. International involvement has also increased considerably. On the other hand, while employer involvement is gaining importance, a number of difficulties to implementation persist.

Recommendations for EQA in the EHEA are related to transparency, consistency and credibility of EQA. Regarding transparency, they touch upon a more thorough and accessible publication of assessment reports and their more unified format, as well as using a common QA terminology in the entire EHEA. Panel members and their CVs should by default be included in assessment reports and these reports should be made accessible in each HE system through national registers of recognised HE. Efforts should also be made to establish a European portal for HE providing a search engine to ensure pan-European accessibility of information. EQAR could play a more prominent role in promoting transparency of QA and trust in its results and would, from a users’ perspective, be a good place for such information. Furthermore, EQAR should oblige all of its registered QAAs to submit yearly updates on their QA activities carried out in another legislation than the one they were founded to operate in. This update should be conducted once per year and contain a list of QA reviews performed across borders, the type, status and recognition of these activities, information whether they substitute legally required QA procedures, as well as whether the QAA has cooperated with other QAAs (and which) and what where the aims and objectives of this cooperation (e.g. accreditation of joint programmes). This information should be published in a new register of quality-assured programmes and institutions maintained by EQAR. For these additional tasks to be feasible, however, more funding for EQAR will be necessary.

Regarding consistency, QAAs should ensure that all panel members in QA procedures are adequately trained and meet agreed-upon standards. All QAAs should keep track of the experts they have trained and who have taken part in QA procedures, as well as make this data available to other QAAs. Since both QFs and ECTS hinge on the use of LOs, all QAAs should introduce intended and achieved LOs into their assessment frameworks.

Regarding credibility, the assessment of quality should be more clearly separated from that of national requirements. QAAs are often obliged by law to assess national requirements which are not about quality itself. This hinders cross-border cooperation, such as joint programmes requiring accreditation in several HE systems. Therefore, national QA systems should provide for a clearer distinction between assessing compliance with the legal framework and assessing the quality of programmes. The independence and competence of experts should be demonstrated in the assessment reports by including their CVs in an annex. Moreover, all panel members should be required to sign a statement of independence which outlines how a QAA interprets independence (also included as an annex to the assessment report). To ensure consistent recognition of credits and degrees, recognition procedures need to be linked to QFs and LOs. To reach this goal, the ENIC-NARICs should be involved more coherently in policy-making at the European level. To ensure mutual recognition of QA results, the ESG need to be amended to cover the quality of education, in which they intend to convey trust. In order to credibly claim that agencies using them take the quality of education into account, the Standards and Guidelines need to be updated to include references to QFs and LOs.

### **EQAR is growing but faces a number of barriers for its full intended functioning**

Since 2009 much has undoubtedly been achieved by EQAR. 28 agencies, based in 13 European countries, mostly EU Member States, are featured on the Register. Agencies apply for registration primarily to improve their national and international reputation, to fulfil the expectations of governments or stakeholders and to facilitate the recognition of institutions or programmes reviewed by the agency, rather than to gain access to an European „market” for QAAs, as was originally intended by the ministers. Only 43% of registered QAAs operate across borders, facing numerous challenges related to national differences and lack of a common European QA framework. Among EHEA agencies,



that have not yet applied for inclusion, only 50% plan to do so partly because the benefit of registration is not yet clear.

Stakeholders and governments consider EQAR's organisational structure as fit-for-purpose and effective. 30 EHEA countries joined EQAR's structures as Governmental Members, however many of them lack sense of EQAR's ownership and willingness to promote it and its use at national level. Generally agencies find the registration process transparent and have no major concerns regarding consistency and fairness of Register Committee's decisions. Main doubts raised by stakeholders are primarily related to using the ESG for registration purposes and not communicating clearly the potential for different interpretations of „substantial ESG compliance” made by EQAR and ENQA.

The initial impact of EQAR has only somewhat contributed to the achievement of the strategic goals set out for the Register by its founders. On the positive side, EQAR has acted as a driver of ESG implementation, contributed to improving the quality of agencies, primarily in internationalising the review panels and promoting stakeholder involvement, and strengthened the position and reputation of registered QAAs at national and international level. On the other side, EQAR's role in increasing transparency of agencies assessments and QA in general has been more limited. Progress is slower than expected especially in terms of EQAR's impact on opening national HE systems to registered agencies.

In 2009 there was virtually no evidence of national legislation recognising EQAR-registered agencies and their decisions, however it was assumed countries need more time to satisfy themselves with EQAR's reliability and draft adequate legislation. Since then, 9 European countries have allowed their HEIs to work with foreign, registered agencies for their regular external evaluation, audit or accreditation procedures and 2 more have recognised decisions of all EQAR agencies on joint programmes. A mapping of cross-border QAAs activities was hindered by lack of systematic data collection on the subject. To shed some light on the scope of international QA activities, CHE Consult has conducted a joint survey with EQAR among registered agencies. The results give an indication of QAA activity patterns.

So far, governments have been rather reluctant to allow EQAR-registered agencies to operate in their HE system, for a number of legitimate reasons. Ministries may fear to lose control over their national HE system, particularly in countries where decisions on HEIs/programmes' funding or existence are based on the outcomes of QA. They may also doubt whether national quality criteria are adequately checked by foreign agencies, especially since EQAR does not have provisions suitable to ensure this. Some of the lack of trust in EQAR-registered agencies can be attributed to the current content and formulations of the ESG. On the flipside, QAAs and governments do not clearly see the added value of creating the international „market” of QAAs and even among EQAR-registered agencies there are doubts about the goal of creating one. Because of the above mentioned barriers, despite high stakeholders' expectations, it is by no means evident that reviews from foreign QAAs will soon become commonplace in the EHEA.

Nonetheless, the idea of a strong, European cooperation in EQA, with EQAR as its main pillar, should not be abandoned, for without it the common QA dimension is not complete. A coherent QA framework for EHEA should be a framework in which HEIs are free to choose any EQAR-registered agency for their EQA reviews and in which qualifications are thus universally recognised. EQAR is a promise for the future. Whether or not this promise can be delivered, will be decided by the revision of the ESG and the subsequent ability of EQAR to make a strong case for the quality, reliability and soundness of its member agencies' QA procedures. The recommendations made in the Study may help to facilitate progress in this area.

### **There is progress in QA in the EHEA**

The trend in all areas covered by the report is positive, even though progress is often more significant in certain areas, than in the other. Some developments in HE impacting on QA, e.g. QFs, have been slower than expected. It has become clear that QFs' impact on recognition hinges on an overall orientation at LOs, which need to be understood and fully implemented on the level of programmes, institutions, QAAs, credential evaluators and ENIC-NARICs. The impact of quality labels on QA is so far not evident, but they could help to develop subject-specific QFs. High number of QA-related activities conducted by the E4 organisations in the recent years, their increasing concordance on revising the ESG and identifying the most important barriers to the European QA dimension give reasons to be optimistic. It is of paramount importance to continue an open dialogue on how QA can really help to improve quality of

European HE and how cooperation between HE systems can help to spread good practices within the EU and the entire EHEA. The current revision of the ESG provides an opportunity to restart this dialogue.

## 2. INTRODUCTION

The EHEA aims at ensuring more comparable, compatible and coherent systems of HE in Europe. One of the key impediments for mutual recognition of degrees, mobility and a truly unified EHEA is a lack of trust in adequate QA between the constituent countries of the EHEA.

In principle, QA of HE is and will remain a national prerogative. This fact notwithstanding there is a growing European dimension. While the recognition of professional qualifications falls under EU jurisdiction, the mutual recognition of academic degrees for the purpose of further study does not. This leads to a certain „expectation gap” regarding the freedom of movement, as shown by a recent Eurobarometer qualitative study: citizens expected their qualifications to be accepted anywhere in the EU<sup>1</sup>. However, the recognition of academic and professional qualifications (or lack thereof) was identified as a key barrier to working or studying abroad, and the majority of respondents of the study regarded it as important that there should be ways of recognising qualifications obtained in different countries. The European Commission has made the reform of the system of recognition of professional qualifications one of the priority actions in the Single Market Act as a means to facilitate mobility. The modernised Professional Qualifications Directive<sup>2</sup> was planned for 2012. On 19 December 2011, the Commission has adopted a legislative proposal for modernising the Directive, based on the outcome of broad consultations with Member States and stakeholders<sup>3</sup>. With regard to academic degrees, most European countries ratified the Convention on the Recognition of Qualifications concerning Higher Education in the European Region<sup>4</sup>, commonly referred to as the Lisbon Recognition Convention. Countries and HEIs are thus obliged, for example, to recognise qualifications, unless they can demonstrate substantial differences between its own qualifications and the qualifications for which recognition is sought. The principle argument stated for not recognising degrees or credits are most often quality concerns.

QA is therefore key to enhancing trust into the comparability of quality education within the EU and the EHEA – and making sure that recognition is not dependent on other considerations.

The European inter-governmental Bologna Process has brought about extensive reforms of the HE landscape. For example, all HEIs in the European Union are reforming their degree structures and are introducing new degrees. While QA was already one of the six Bologna Declaration objectives in 1999, since 2003, it has been considered one of the key action lines in the Bologna Process with European QA framework constituting a significant issue in Ministerial meetings. Correspondingly, EQA in HE has notably grown in the last decade (Education International 2010, p. 24). At the same time, the European QA landscape has changed considerably (ENQA 2011, p. 5). The majority of EHEA countries still mainly use EQA to grant permission to HEI or programmes to operate based on threshold quality standards. An improvement-oriented QA approach as sole EQA system is used by a minority of countries (Education International 2010, p. 24). Depending on their historical and cultural background some countries, as Sweden, went far beyond the ESG and other Bologna tools (Westerheijden et al. 2010a, p. 160). While there have been no substantial developments on the European policy level, both ENQA and EUA studies show that the field of QA is rather dynamic (SH-Interview). Many positive developments have been recognised, including growing professionalization in QA, stakeholder and student involvement and

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<sup>1</sup> Eurobarometer Qualitative Studies: Obstacles citizens face in the Internal Market - Aggregate Report. September 2011.

<sup>2</sup> Directive 2005/36/EC on the recognition of professional qualifications

<sup>3</sup> [http://ec.europa.eu/internal\\_market/consultations/2011/professional\\_qualifications\\_directive\\_en.htm](http://ec.europa.eu/internal_market/consultations/2011/professional_qualifications_directive_en.htm)

<sup>4</sup> [http://www.coe.int/t/dg4/highereducation/recognition/lrc\\_EN.asp](http://www.coe.int/t/dg4/highereducation/recognition/lrc_EN.asp) (last visited on April 27)

practical alignment between QA and other Bologna tools. In 2006, the European Commission<sup>5</sup> stressed the need for transparent QA systems and enhanced European cooperation, which paved the way to the establishment of EQAR in 2008. In the 2009 report on progress in QA in HE<sup>6</sup>, Commission stated the need to further develop the ESG and support a stronger European dimension in QA.

In our consortium's understanding, the „Study to prepare the report on progress in the development of quality assurance systems in the various Member States and on cooperation activities at European level” aims at identifying recent (since the 2009 progress report) developments in QA in European HE. A particular emphasis will be laid on the implementation and revision of the ESG, the activities of EQAR and the E4 Group, as well as on other developments at national, regional and sectoral levels. The information collected through this project will serve as the foundation for the second progress report, which is to be published by the European Commission in 2013.

## **2.1 OBJECTIVES OF THE STUDY AND RESEARCH QUESTIONS**

Based on the Terms of Reference, European Commission's guidelines and expectations, presented and discussed during the kick-off meeting in Brussels, as well as preliminary findings of the desk-research phase, the guiding research questions of the Study were agreed to be the following:

**What progress has been made towards achieving the objectives set in 2006<sup>7</sup> and the recommendations made in the last progress report<sup>8</sup> in 2009?**

- 1. What were the developments regarding QA action line and policies on the European level?**
  - a) How has the QA line changed on EHEA level? Overview of Ministerial Communiqués.
  - b) What considerations have led to the decision to revise the ESG? What impact is expected from the revision?
- 2. What were the developments regarding internal QA?** Have HEIs introduced or developed IQA systems in accordance with the ESG?
- 3. What were the developments regarding external QA?** Have QAAs:
  - a) substantially complied with the ESG?
  - b) changed the scope and/or type of their activities?
  - c) cooperated and/or merged with other, foreign or domestic, QAAs?
  - d) been internationally active and sought recognition across borders?
- 4. What were the developments regarding EQAR?**
  - a) What have been the activities of EQAR? What progress has been made regarding quantitative growth (number of registered agencies, number of applications, etc.)?
  - b) Has public, easy and on-line access to the assessments made by the EQAR-registered agencies been ensured?

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<sup>5</sup> Council Recommendation 98/561/EC of 24 September 1998 on European cooperation in quality assurance in higher education, and Recommendation 2006/143/EC of the European Parliament and the Council of 15 February 2006 on further European cooperation in quality assurance in higher education

<sup>6</sup> Report from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions:

<sup>7</sup> Recommendation (2006/143/EC) of the European Parliament and of the Council of 15 February 2006 on further European cooperation in quality assurance in higher education<sup>7</sup>, the Commission and the Member States support cooperation between higher education institutions, quality assurance and accreditation agencies, competent authorities and other bodies active in the field.

<sup>8</sup> Reports to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions on progress in the development of quality assurance systems in the Member States and on cooperation activities at European level.

- c) Are the organisational structures and methods of EQAR fit for purpose in the light of the agreed objectives? Have they functioned effectively and efficiently in practice?
  - d) What has been the initial impact of EQAR? Is it in line with the desired goals?
  - e) What improvements are desirable? How might the organisation develop and act further with a view to best achieving its mission and objectives”<sup>9</sup>?
5. **What were the developments regarding EHEA-wide recognition of EQAR-registered agencies?**
    - a) Have Member States taken steps at national level to officially recognise EQAR-registered agencies? Overview of existing policies (including: Are HEIs authorised to choose among EQAR-registered agencies as a substitute to the agencies active in their national context or for additional assessment?; What are the legal practices regarding joint/double degree programmes?).
    - b) Have HEIs exercised the right to request quality reviews by foreign EQAR-registered agencies?
  6. **What were the developments regarding other structures, tools and initiatives aimed at building mutual trust, recognition of QA/accreditation assessments and recognition of qualifications for the purpose of study or work in another country?**
    - a) What were the general developments regarding QFs and recognition? How have they affected/been related to QA?
    - b) What benefits has the Crossroads project yielded? Has there been a closer cooperation with the NARIC-ENIC network within Crossroads/or other projects on mutual recognition?
    - c) Which European quality seals have been successful in cross-border QA?
  7. **What were the developments regarding the E4 Group?**
    - a) What have been the activities of ENQA?
    - b) What have been the activities of EUA in the area of QA?
    - c) What have been the activities of ESU in the area of QA?
    - d) What have been the activities of EURASHE in the area of QA?
    - f) Is the distinction of roles between ENQA, EQAR and ECA clear?
    - e) Which QA related joint activities of stakeholder organisations have there been?
  8. **What were the other developments in QA in European HE?**
    - a) What were the developments in QA of cross-border education?
    - b) What were the developments in QA of MOOCs, distance education?
    - c) What were the developments in QA of short-cycle courses?
    - d) What were the other EHEA-wide initiatives related to QA?
    - e) Has there been cooperation between EHEA and other regions
    - f) Other
  9. **What were the developments regarding students, academics and other stakeholders involvement in QA processes and their perception of QA?** Have QA structures, organisations, processes and tools met their needs?
  10. **What are the trends, achievements, areas requiring attention, recommendations, good practices regarding QA in European HE?**

## 2.2 SCOPE OF THE STUDY

Based on the Terms of Reference and the agreements reached during the kick-off meeting, the following choices were made regarding the focus and scope of the Study:

- **Level of education:** the Study will focus on QA processes governing HEIs considered as such by the pertinent authorities in the Member States where they are established.

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<sup>9</sup> The original source of questions 4 c, d, e: the Terms of Reference for the External Evaluation of EQAR (as agreed between EQAR and the Steering Group).

- **Geographical coverage:** the Study will focus on developments in the 27 EU Member States of the EU but will describe and take account of wider developments in the EHEA, since 2009.

## 2.3 LIMITATIONS OF THE STUDY

While there are numerous case studies in the identified literature, the descriptions are of varying depth and detail and depend on the angle and focus of the particular studies and reports. Also, developments in the area of QA are highly dynamic and what would be considered relatively recent information in other areas is possibly already obsolete in QA.

There is currently no single organisation in the EHEA which has reliable data on the exact nature of QA systems in Europe. To create an in-depth analysis of the QA systems currently in place in the European Union, it would be beneficial to conduct an analysis of national legislation, an analysis of the ENQA agency reports, along with a Delphi survey with national stakeholders, similar to the one conducted by CHE Consult on the cross-border delivery of HE services in the European Union in 2012. However, the limitations in time frame and funding of the Study do not allow for such an approach.

Since out of the reports covering QA in the EHEA (e.g. BFUG implementation report, TRENDS, Bologna with students eyes, QUEST), raw data could only be accessed from the 2012 BFUG report, the main sources of information for the Study were pre-existing reports, formal stakeholder interviews and informal contacts of the research team within the European QA community. These sources were summarised and analysed. In consequence, the comprehensiveness and accuracy of the results do, in considerable parts, depend on the completeness of the existing studies as well as on the views of the involved stakeholders.

## 2.4 RESEARCH APPROACH AND METHODOLOGY

The main method of analysis will be one of triangulating the findings and results of the various studies with stakeholder views and opinions about the research questions, thus exposing trends and contradictions and describing developments. Altogether, the approach is more qualitative than quantitative in nature and is based fundamentally on content derived from these sources.

The following key elements characterise the approach that was applied in gathering and validating the requested information.

### 2.4.1 Desk Research, comprehensive data collection, organisation and analysis

The first key component of the Study was a thorough desk review process. The literature and sources used in the desk research phase are listed at the end of this document. The guiding questions are the ones formulated above (see chapter 2.1.).

Based on these sources, a thorough analysis of the identified literature was conducted. For the literature analysis, the reference management and knowledge organisation software „Citavi“<sup>10</sup> was used. In Citavi, the main pieces of information can be stored and classified according to need. Also, multiple people can work at the analysis of several documents at the same time without the problems that working with distributed knowledge usually causes. Keyword references, quotations and considerations from individual documents can be extracted and centrally stored, while Citavi's hierarchical categories allow the project members to structure and group them according to a number of criteria. Thus, Citavi can help to secure aspects of process quality: firstly, to differentiate qualitatively between different kinds of sources, and secondly, to compare the information gained from different sources. Information from various sources can be classified according to the type of source (such as „students“, „QAAs“, „ministry of HE“) as well as its relevance to the outlined research questions along with its source. With the help of the organising capabilities of the software it was possible to cross-reference the information and the assessments from various sources and phases of development and assure a thorough analysis of the

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<sup>10</sup> <http://www.citavi.de/en/> (last visited on April 27)

existing literature. The main challenge of the present Study was to create a single overview of all of the various QA-related developments in the EHEA and to verify, weigh and reconcile partially conflicting stakeholder viewpoints.

#### **2.4.2 Analysis of original data and mapping of national QA approaches**

As an instrument to add informational depth to the results of the study, CHE Consult had planned to include a mapping of QA systems on a per-country level. This mapping was intended to be based on classification and research categories already used in existing studies and information systems.

Unfortunately, it was only possible to get access to the data basis of the 2012 Bologna Implementation report, and not the data of 2009 report, the data of the latest TRENDS or the ESU-QUEST reports. The analysis of original data for the purposes of the Study is therefore confined to the same data basis the BFUG used in preparing their last report. This, however, would have made data analysis meaningless since the only available source of raw data had already been sufficiently visualised in the last Bologna Implementation report. Therefore, instead of recreating the BFUG maps, the original maps were included in this report, where appropriate.

#### **2.4.3 Consultation of Stakeholders**

To validate and qualify the information collected, CHE Consult has approached leading figures in European QA in HE, notably those from the E4 Group (EUA, ENQA, EURASHE and ESU) and the three other organisations identified in the Bucharest Communiqué (Education International, Business Europe and EQAR). Of all 7 stakeholder groups approached, only Education International reacted late and could not make an interview possible. The consultation of stakeholders was conducted via interviews *in persona* in Brussels and Berlin.

The interviews were led by interview guidelines including the research questions, clarifications arising from the literature review and a number of general questions about the development of QA in the EHEA. The interviews themselves were conducted in a semi-structured format.

The following stakeholder interviews were conducted:

1. Achim Hopbach, President, European Association for Quality Assurance in Higher Education: Interview in Berlin on April 12, 2013.
2. Tia Loukkola, Head of Unit, Quality Management & Institutional Evaluation Programme, European University Association: Interview in Brussels on April 16, 2013.
3. Fernando M Galán Palomares, Executive Committee member, ESU: Interview in Brussels on April 16, 2013.
4. Stefan Delplace, Secretary General, European Association of Institutions in Higher Education: Interview in Brussels on April 17, 2013.
5. Colin Tück, Director, European Quality Assurance Register for Higher Education (EQAR): Interview in Brussels on April 17, 2013.
6. Henning Dettleff, Business Europe, Expert on Quality Assurance: Interview in Berlin on April 19, 2013.

The opinions of stakeholders, expressed during interviews, are referenced throughout the Study as “SH-Interview”. The information shared in some cases reflects the personal views rather than adopted organisational policy. Many of the recommendations suggested in the Study have also been discussed and/or inspired by stakeholder interviews. They are not, however, referenced in the recommendation sections, for the views presented in those sections, and the reasoning behind it, specifically reflect the position of the Study’s research team.

#### **2.4.4 Survey of EQAR-registered QAAs**

EQAR, according to its strategic plan and the priorities set by EHEA Ministers in the 2012 Bucharest Communiqué, had started conducting an analysis to inform stakeholders and policy makers regarding the existing legal practices in EHEA countries recognising EQAR-registered agencies and regarding how

HEIs make use of the existing possibilities to request quality reviews by foreign agencies listed on the Register, as well as the rationale behind it.

Given the overlap of information required for both this, as well as the EQAR's studies, EQAR and CHE Consult agreed to jointly conduct a survey among EQAR-registered agencies. The survey delves into the international activity of QAAs registered in EQAR as well as the status/recognition of these activities, whether they substituted legally required QA procedures or whether they were undertaken in addition to legally required EQA procedures. The QAAs were also asked for their views on the main benefits and challenges of being an internationally active QAA, reasons for EHEA countries not to recognise foreign EQAR-registered agencies and their perspectives on the further internationalisation of QA. The survey was open between Monday, March 11, 2013 and April 1, 2013.

Unfortunately, only 10 EQAR-registered QAAs participated in the survey. The following EQAR-registered agencies submitted (at least partial) information to the Survey: ACSUCYL, ACSUG, AEQES, AERES, AQU Catalunya, ASIIN, Centre for Quality Assessment Lithuania, CTI, evalag, FIBAA, IEP, NVAO, OAQ (Switzerland), QANU, SKVC, VLUHR (former VLHORA).

### 3. RESULTS

#### 3.1 WHAT WERE THE DEVELOPMENTS REGARDING QA POLICIES ON THE EUROPEAN LEVEL?

##### 3.1.1 How has the QA action line developed in the Ministerial Communiqués?

###### **Until 2010, the main instruments in the EHEA QA architecture had been introduced**

QA has been on the Bologna agenda from the very beginning. In 2001 „Ministers called upon the universities and other higher education institutions, national agencies and the European Network of Quality Assurance in Higher Education (ENQA), in cooperation with corresponding bodies from countries which are not members of ENQA, to collaborate in establishing a common framework of reference and to disseminate best practice.” A major step to establish such a common basis for QA procedures within the EHEA has been the adoption of the ESG by the ministers in 2005. At the conference in 2007 the establishment of EQAR was agreed on. In 2009, one year after its foundation, the ministers recognised EQAR and the establishment of National Qualifications Frameworks (NQFs) linked to the overarching QF-EHEA. The ministers further requested the emerging „multidimensional transparency tools” to relate closely to the existing Bologna Process instruments, in particular QA and recognition and set the agenda for the second Bologna decade, until 2020.

###### **In 2010 the importance of a joint understanding of the Bologna Process was highlighted**

At the Ministerial Conference in 2010, when the EHEA was officially launched, the Ministers declared to aim at „the full and proper implementation of the agreed objectives”. In order to achieve this, further efforts were requested, predominantly on the national and HEIs level. A better communication on and joint understanding of the Bologna Process among the stakeholders was seen as crucial (EHEA Ministerial Conference 2010, pp. 1-2). Moreover, the ministers declared their commitment to enhance the role of students by fostering „student-centred learning” (EHEA Ministerial Conference 2010, p. 2).

###### **The integration of different Bologna action lines has come to the fore**

In 2012, emphasis was put on the social dimension, namely to further open HE to underrepresented groups (widening access). This happened in the knowledge that the financial crisis limits both adequate funding as well as graduates' job prospects (EHEA Ministerial Conference 2012, pp. 1–2). Institutions have been since pressed to find new ways of using limited resources to maximise results. QA is expected by many to help achieve this result.

To further enhance mutual trust, the ministers committed to strengthen EQAR and other tools, such as ECTS and Diploma Supplements (BFUG Working Group "Mobility for Better Learning" 2012, p. 4). Moreover, the Bucharest Communiqué explicitly pointed out that to „consolidate the EHEA, meaningful implementation of **learning outcomes** is needed. The development, understanding and practical use of



*learning outcomes is crucial to the success of ECTS, the Diploma Supplement, recognition, qualifications frameworks and quality assurance – all of which are interdependent”.*

The mobility strategy „Mobility for Better Learning” adopted in 2012 (BFUG Working Group on Mobility 2012, p. 11) is a vivid example for the more complex demands on QA and the integration of different action lines: QA and transparency tools should help to „promote high quality mobility inside and outside the EHEA” (BFUG Working Group "Mobility for Better Learning" 2012, p. 3). This includes:

- The relevance and quality of mobility periods, in particular QA of HE in destination countries (BFUG Working Group "Mobility for Better Learning" 2012, p. 3; BFUG Working Group on Mobility 2012, p. 4) which is considered to be a prerequisite for a balanced mobility and prevention of brain drain (Education International 2010b, p. 3).
- Supporting services for students (BFUG Working Group on Mobility 2012, p. 9).
- The effective cooperation and action regarding recognition of qualifications and QA results within EHEA, as well as QA cooperation with other regions [outside of the EHEA]. In particular, EQA processes should minimise the bureaucratic burden on joint programmes (BFUG Working Group "Mobility for Better Learning" 2012, p. 4).

The following diagram shows the QA action line in the context of the overall developments since 2009.

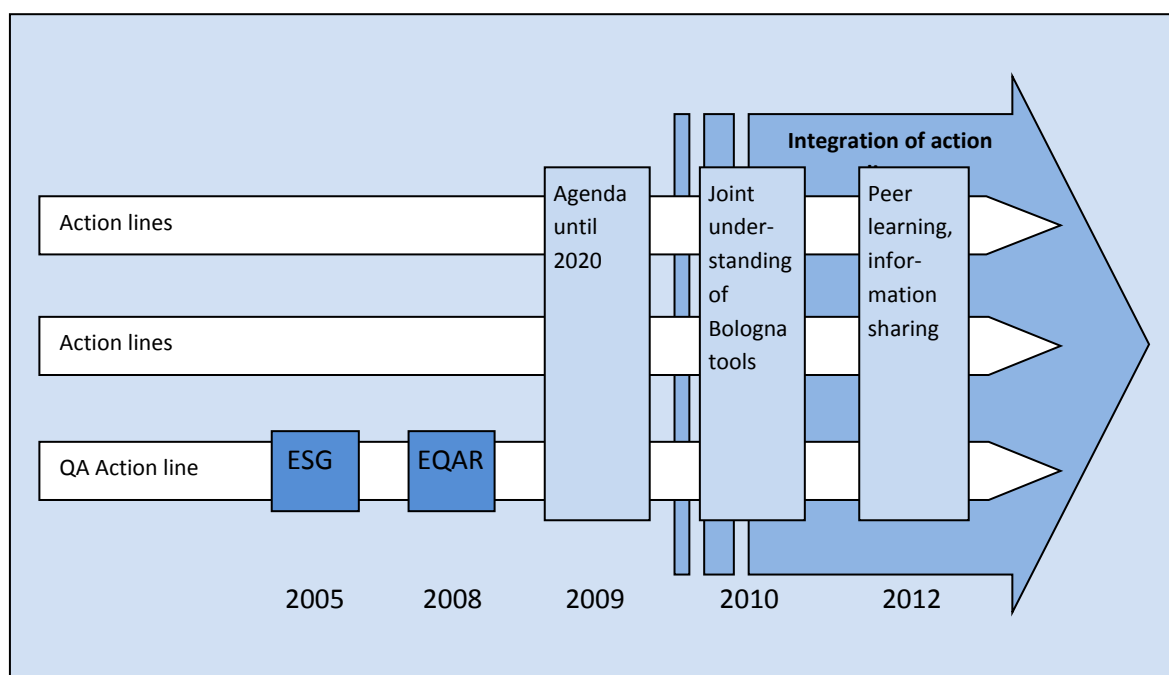


Figure 1: Overview of Ministerial Communiqués

In summary, the most important milestones in the field of European QA were the adaptation of the ESG in 2005 and the establishment of EQAR in 2008. Since 2005 the Ministerial Communiqués have mainly registered achievements and added new actions, only if this was considered to be necessary to achieve the goals set earlier (Westerheijden et al. 2010b, p. 29, Rauhvargers et al. 2009, p. 20). In the last years, the integration of different action lines and links between existing Bologna tools came to the fore, along with a growing awareness that **QA cannot be considered independently of other areas of HE**. The Ministers also seem to have become more confident in the Bologna tools, such as the QF-EHEA, and are starting to combine them (SH-Interview). In particular, the **BFUG Working Group on Structural Reforms** (established by the Bologna Follow-up Group as part of the 2012-2015 work plan) aims at improving the implementation and coherence between the main elements of EHEA structural reform, i.e. QA, QFs, recognition and transparency tools.

This has broadened and further strengthened the role of QA in successful implementation of the Bologna Process. Through their commitments within the Bucharest Communiqué in 2012, the ministers set the course for the future development of QA in the EHEA (Tück 2013, p. 8).



### **3.1.2 What considerations have led to the decision to revise the ESG? What impact is expected from the revision?**

The Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) have been established in 2005. The implementation of the ESG has since helped to align national QA systems all over Europe to a shared understanding of certain main characteristics of the „European“ QA (such as the responsibility of HEIs for HE provision, the independence of QAAs, the involvement of external experts, students and other stakeholders in QA, the use of the self-evaluation/site visit/panel report/follow-up model of EQA, to name but a few). While these points were controversial back in 2005, they are not disputed anymore (SH-Interview). The ESG have proven to be internationally accepted standards, applicable across diverse contexts (ENQA 2011, p. 23). They are perceived to be a useful and useable tool, which has been widely adopted by both HEIs and QAAs in all countries within the EHEA (ENQA 2011, p.16). Even though, as evidenced in chapters 3.2 and 3.3, there is not much consistency in their implementation at any level (ENQA 2011, p. 22), they have contributed to greater awareness and transparency regarding evaluations of programmes, HEIs and QAAs (BFUG Working Group ‘International Openness’ 2012, p. 103) and had a considerable and unprecedented impact on the development of national and institutional QA systems (ENQA 2011, p. 22).

#### **Since the implementation of the ESG, there have been substantial developments in European HE affecting their purpose and raising questions with regard to their scope and applicability**

Since 2005 the European HE framework and landscape, including QA, has undergone major changes. There have been significant developments in terms of Bologna action lines and commitments such as: development of QFs, shift towards student-centred learning with emphasis on learning outcomes, increasing internationalisation, including mobility and cross-border education, as well as promotion of the European QA dimension. Other trends have been related to rising importance of transparency, proliferation of international quality labels, accreditation programmes (e.g. EQUIS) and QA models (e.g. ISO, EFQM), or growing emphasis on internal quality cultures (ENQA 2011 p. 9, 46; (SH-Interview)).

The ESG were developed without much consideration for the other action lines of the Bologna Process. This was acceptable back in 2005 as some Bologna tools, e.g. QFs, had not even been established then. Today issues of quality, recognition, QFs, LOs and related instruments, such as ECTS, are all interlinked in the daily practice of HEIs. Respectively, the missing link between QA and the other Bologna tools has increasingly been seen as problematic for the ESG (SH-Interview).

Furthermore, in 2008 the ESG have been adopted as criteria for membership in ENQA and registration on EQAR, raising additional questions and challenges with regard to the purpose and applicability of the Standards and Guidelines. In particular, how to use the enhancement-oriented document, which leaves much room for interpretation, to verify compliance (see chapter 3.4.2.2). With the developments of EQAR, it has also become clear that the „traditional“ QA according to the ESG does not take into consideration the specific challenges of cross-border QA (including QA of joint programmes) and thus hinders international cooperation and creates barriers for creating a common European dimension for EQA (see chapters 3.5.1 and 3.8.1).

#### **One of the main complaints about the ESG has been that they are more about the quality of QA than the quality of education**

The ESG are the main instrument, upon which trust can be built within the EHEA, yet, at the same time, they do not explicitly cover the quality of education, in which trust should be established, but are oriented solely towards quality of QA procedures, processes and preconditions.

This approach has become problematic, especially since there is still a lot of scepticism whether QA processes have actually assured and improved the quality of education (ENQA 2011, p. 16). The available literature on QA contains numerous reports warning that the frenzy for quality assessment, quality audit, quality assurance, quality review, quality accreditation, etc. has produced little evidence for the intrinsic improvement of the learning experience of students (IBAR 2012d, p. 4). On the other hand, so far there has been no study exploring and providing evidence of the QA impact. Most of the existing

„evidence“ is based on assumptions and anecdotes (SH-Interview). The lack of clearly visible evidence is definitely contributing to the uncertainty regarding the ESG.

The issue is particularly crucial when it comes to mutual recognition of credits, degrees and QA results. It has become evident that compatible and comparable quality of education does not result from compatible QA systems, but from combined meaningful learning outcomes and qualifications frameworks (Westerheijden et al. 2010b, p. 36). Thus again, the ESG in their current version, detached from QFs and LOs, seem to be insufficient to close the existing gap in trust between HEIs and in foreign QA agency's decisions. Clearly, as described in chapter 3.5.1, some of the barriers to opening national HE systems to EQAR-registered agencies (acting in compliance with the ESG) can be attributed to the current nature and content of the Standards and Guidelines.

### **Consequently, the need to revise the document has become apparent**

Consequently, the idea of revising the ESG began to surface. Especially, as the necessity for integration of the different Bologna action lines had become evident, the need to revise the ESG along these lines also came to be apparent (SH-Interview). The 2009 progress report included a clear recommendation to revisit the Standards and Guidelines and hence this issue has been addressed systematically in various meetings, events and forums attended by HE actors and stakeholders (ENQA 2011, p. 11). However, until 2011, there had been no consensus on whether or not a general revision of the ESG was necessary, nor in which direction it should go (ENQA 2011, p. 4, 11). Furthermore, there had been no overarching study on the implementation of the ESG, no thorough analysis of their impact (SH-Interview).

### **The MAP-ESG project has gathered information and stakeholders views on the implementation and application of the ESG and started the discussion on its revision, indicating areas for improvement**

In 2010, with the backing of the European Commission, the E4 launched the MAP-ESG project to collect and collate information on the implementation and application of the ESG in EHEA countries, as well as to start a comprehensive discussion on the need for a revision and potential areas for improvement. Within the project framework, views from all relevant actors and stakeholders in HE (teachers and students, HEIs management, IQA bodies, QAAs, EQAR, ministries and social partners) have been gathered (ENQA 2011, p. 4).

As a result of the project, a broad agreement about the following main statements was reached:

- The ESG need to be updated,
- Any revised version of the ESG needs to respect diversity and HEIs' autonomy, whilst creating comparability (ENQA 2011, pp. 9, 17),
- Revision should be carried out on a consensual basis, in consultation with all relevant stakeholders (ENQA 2011, pp. 6, 24),
- Underpinning principles of the ESG should be maintained (ENQA 2011, pp. 6, 45),
- The ESG should keep their generic approach in order to ensure the continuing relevance of the document to all stakeholders and to maintain their authority as a common reference point for QA in the EHEA (ENQA 2012a, pp. 4, 8; ENQA 2011, p. 23). They should neither become a checklist nor a set of rules or compliance tool (ENQA 2011, pp. 6, 23),
- Revision should bear in mind that levels of implementation vary greatly and many HEIs and QAAs has only just started to adopt the ESG (ENQA 2011, p. 22),
- Revision should address the tension regarding the ESG purpose (reference document as opposed to compliance tool),
- Revision should be used to raise the feeling of ownership of the ESG, especially among faculty staff (ENQA 2011, p. 23, SH-Interview).

Consensus was achieved that the revision of the ESG is expected to:

- Focus on the improvement of the ESG, their clarity, applicability and usefulness, rather than on a wholesale revision of the content,
- Make the relationship with other Bologna tools, such as QFs and the ECTS more explicit (ENQA 2011, p. 18),
- Clarify the terminology and ensure removal of ambiguity in terms of the language used and with regard to the standards and guidelines themselves. The revised document should be written in

a way to avoid contradictory interpretations, make the ESG more „user-friendly” and enhance a common understanding of QA within EHEA (ENQA 2011, pp. 6, 19, 23).

The latter point has become one of the central concerns regarding ESG, identified by all stakeholders’ consultations within the MAP-ESG project. Indeed, while the ESG are widely used across different EHEA contexts, the QA terminology is not yet unified. This may be one of the reasons why the ESG have so far avoided to explicitly define ‘QA agencies’ or ‘external QA processes’ (ENQA 2011, p. 18). In general, the language, phrasing and terminology of the ESG is often unclear. Moreover, the document lacks a coherent approach when it comes to particular standards and guidelines. Significant differences can be enumerated as far as the precision of formulation of different standards and guidelines is concerned, not to mention the ambiguous role and relationship between them. This may result in inconsistencies in interpretation and application of the ESG, including among panel members (ENQA 2011, pp. 19, 20, 37).

Besides the above mentioned, general expectations, numerous other, more detailed, suggestions to improve the ESG have been identified within the MAP-ESG project, some of which have been used to draft the recommendations made at the end of this chapter.

It is worth mentioning that, regardless of the common agreement that the ESG should remain as generic principles, ESU consultation insisted that the revised document needs also to be concrete enough e.g. in standards dealing with the publishing of reports and follow-up procedures to ensure comparability of EQA systems thus indirectly facilitating comparability of outcomes of different HE systems and ease of mobility. ENQA, EUA and EURASHE respondents, while not disagreeing with this aim, emphasised that such comparability would need to be at broad level in order to ensure that diversity is respected (ENQA 2011 p.17).

Finally, within the MAP-ESG framework, only the ESU respondents saw the need to broaden the scope of the ESG beyond including clear linkages and references to the specific principles and commitments undertaken within the Bologna Process, via addressing institutional management, research, social dimension, lifelong learning or transnational education. In their opinion, widening the scope is essential in order to enhance QA contribution to high quality of education (ENQA 2011, p.36). Other members of the E4 group stated that further areas requiring consideration would lead to significant increase in bureaucracy, might lead to a check-list approach and a possible negative impact on HEIs’ responsibility for the quality of education they offer, due to a possible, increasingly intrusive role of EQA (ENQA 2011 pp. 17, 18). At the same time, there was however a general consensus that strong link between research and teaching should be made more explicit within the ESG.

#### **The MAP-ESG project has led to the current comprehensive revision of the ESG to improve their clarity, applicability and usefulness, including scope**

In the Bucharest Communiqué the ministers acknowledged the MAP-ESG report and committed to revise the ESG „to improve their clarity, applicability and usefulness, including their scope” (EHEA Ministerial Conference 2012, p. 2). This project is currently carried out by the E4 and other stakeholders including EQAR, EI and BUSINESS EUROPE. The final report is scheduled for spring 2014 (SH-Interview). The ministers plan to adopt the revised ESG by 2015, at the next Ministerial Conference.

#### **Recommendations**

The Study’s research team concurs with the main conclusions and recommendations of the MAP-ESG project, stating, among others, that the revision of the ESG should be carried out on a consensual basis, in consultation with all relevant stakeholders and that the underpinning principles and generic approach of the ESG should be maintained. The following recommendations highlight the most significant areas to be taken into consideration in the revision process, so that the revised Standards and Guidelines for QA enhance and convey trust in the quality of HE.

## The revised ESG should

1. continue to focus on the teaching and learning mission of HEIs. Widening the scope to institutional management, research or service to society would be difficult in terms of coming to a consensus on principles for QA in these fields. However, the link between education and research, as well as service to society (3 core missions of HEIs) should be made more explicit within the ESG to promote a holistic approach to QA. Moreover, the revised ESG should address the specific matters crucial for QA of third cycle studies. Currently, although the ESG cover all study cycles, the specific aspects of research oriented study programmes are not taken into consideration. Finally, the revised ESG should include a more convincing focus on the teaching and learning process and outcomes, expanding their current scope oriented primarily at QA procedures and preconditions.
2. be set in the overall EHEA framework. Links to other Bologna action lines, priorities and commitments should not only be added in the introductory text of the ESG but also included in relevant Standards and Guidelines. In particular, the revised ESG should:
  - closely link QA Standards and Guidelines with LOs, QFs, recognition of qualifications and transparency, including tools for their implementation, such as Diploma Supplement, ECTS and the Lisbon Recognition Convention. In particular, the relevance of recognition procedures and QFs for QA, as well as their inclusion into QA processes needs to be taken into consideration. The inclusion of QFs and LOs into the ESG should ensure that curricula and student assessment methods are based on learning outcomes (which are in line with the NQS, the QF-EHEA as well as discipline related requirements), that the teaching and learning process, together with the content of the programme, enable students to reach the intended LOs (including that the student workload needed to achieve the LOs is properly determined) and that both intended and achieved learning outcomes are subject to QA. Aligning the main elements of the structural reform within the EHEA together, via QA, will not only enhance coherence between them and foster their implementation, but also will orient the ESG towards quality and level of education, not only quality of QA,
  - relate to other Bologna action lines and EHEA priorities (social dimension of HE, lifelong learning, mobility and internationalisation, employability, etc.). In particular, to ensure employability, the revised ESG could state that HEIs consider external stakeholders', mainly employers' and graduates', opinion when designing or revising intended LO's and programmes;
3. ensure that the specific challenges of cross-border QA and common European QA dimension are considered. In particular, the revision should take account of the ESG's importance in underpinning trust in EQAR-registered agencies and thus in increasing the willingness of Member States to allow registered QAAs to perform their activities in national HE systems and to recognise their decisions on joint programmes (see chapter 3.5). In particular, the revised ESG:
  - should still fit as criteria for EQAR-registration purposes,
  - include references to QFs and LOs (see above) to ensure mutual recognition of QA results, i.e. in order to credibly claim that agencies, acting in compliance with the ESG, take into account and certify quality of HE provision, not only quality of QA (see chapter 3.3.5.3),
  - should include standards and guidelines regarding QA of joint programmes to foster the common pan-European accreditation approach for joint programmes and overcome the existing obstacles to cooperation and mobility embedded in national legislation (see chapters 3.3.5.3 and 3.8.1),
4. put more emphasis on the development of quality cultures and continuous improvement of the teaching and learning processes and outcomes;
5. strengthen congruence between standards regarding strategic documents prepared by HEIs and QAAs (mission statements, strategies, policies) and those dealing with their activities;
6. take into consideration the recommendations regarding transparency, consistency and credibility of EQA presented in chapter 3.3.5, in particular:

- develop and define more precisely the standard and guidelines regarding publication of EQA reports to ensure a more thorough and accessible publication of those reports, as well as their more unified format in the entire EHEA (see chapter 3.3.5.1),
  - develop and specify the standard and guidelines regarding panel members to ensure their independence and competence, as well as to increase consistency between panels (see chapter 3.3.5.2),
  - continue to allow for a diversity of purposes and highlight that the QA procedures and tools need to be fit-for-purpose and able to correctly assess the right outcomes (see chapter 3.3.5.2);
7. define stakeholder involvement (including student involvement) more explicitly and consistently, both as a principle and within different standards and guidelines, as well as fully integrate the principle of students as full members and equal partners of the academic community. Moreover, the revised ESG should more strongly refer to external stakeholders and define their role in QA processes;
  8. be as clear as possible to all stakeholders and users of the document in terms of format, terminology and language used. Revision should ensure that all possible ambiguities are removed. In particular:
    - clearer definition of the terms „standards” and „guidelines”, as well as demarcation between them is required. The revised document should have a coherent approach and structure with precisely defines standards and their guidelines,
    - to help overcome inconsistency of interpretation and enhance shared understanding of QA, a glossary of QA terms should be included in the revised document. However, since less room for interpretation will at the same time leave less room for flexibility, this trade off should be carefully discussed in the revision process. The joint glossary, while ensuring more comparable QA practices, must not enforce uniform solutions nor hinder diversity of QA procedures;
  9. be completed and followed by separate documents further clarifying and enhancing their purpose and content e.g. a guidebook or explanatory report on how to use the ESG for external reviews (similar to that of the Lisbon Recognition Convention). Practical guidance on how to set up QA processes and effectively implement the ESG should be provided by other means (workshops, training programmes, peer-learning, handbooks of good practices etc.).

### 3.2 WHAT WERE THE DEVELOPMENTS REGARDING INTERNAL QA?

Reporting on developments of QA at institutional level is particularly challenging. Until today there is no systematic analysis of internal quality assurance (IQA) systems within the EHEA. The BFUG implementation reports give insight only into a fragmentary area of IQA. Moreover they are not based on the direct input from HEIs or QAAs, but rely heavily on answers from national authorities. Available studies and literature can also give only a limited picture regarding the state of developments at institutional level. Consequently, in the broader international perspective, the links between ESG part 1 and their implementation on institutional level remain unexplored.

The study is widely based on the findings from the *Examining Quality Culture in Higher Education Institutions* (EQC) project, run by EUA (2010-2011), within which 222 institutions from 36 EHEA were surveyed, as well as the *Trends 2010* Report, the MAP-ESG project and *The Bologna Process Independent Assessment: The first decade of working on the European Higher Education Area* reports. Moreover, the *Identifying Barriers in Promoting the European Standards and Guidelines for Quality Assurance at Institutional Level* (IBAR) international project in the EU Lifelong Learning Programme (2011-2013), researching developments in 7 European countries (Czech Republic, Latvia, The Netherlands, Poland, Portugal, Slovakia, United Kingdom), has provided an interesting illustration of the situation from the institutional „grass-roots” perspective. While these are mostly studies conducted before 2012, they were triangulated with more recent publications (BFUG, Bologna with Student Eyes) and stakeholder interviews to assure reliable and up-to-date judgment.

Good practice examples, largely inspired by a publication by the Polish Foundation for the Development of the Education System<sup>11</sup> and a presentation by a Bologna Expert<sup>12</sup> can be found in the annex to the report.

### **3.2.1 What were the general developments of IQA?**

#### **Since 2009, developments of IQA have gained significant momentum**

In 2006, the European Parliament and the Council of the EU, recommended that Member States encourage all HEIs active within their territory to introduce or develop rigorous IQA systems, in accordance with the ESG. Since 2006, progress in IQA has been remarkable and undisputable. Over 60% of HEIs identified QA reforms as one of the major developments (second most important after the Bologna Process) that had shaped their institutional strategy and processes in the last decade (SURSOCK, SMIDT 2010, p. 21, 73). Nonetheless, when the first EU progress report was issued, national representatives perceived the developments at institutional level as progressing more slowly, than the rapid pace of EQA implementation and called for greater focus on IQA (Rauhvargers et al. 2009, p. 51 - 56). Stakeholders concur that since 2009, developments at institutional level have gained significant momentum (SH-Interview). It has become clear that IQA is truly on the agenda of European HEIs and shows no signs of fading away, especially since expectations towards increased quality, mobility and transparency in the EHEA only seem to be strengthening (Loukkola, Zhang 2010, p. 40).

#### **Impressive progress at institutional level has been inspired by European and national level policies, with the ESG having a substantial impact on IQA developments**

In 2003, the EHEA Ministers agreed that HEIs should have their own institutional QA systems and two years later the ESGs were adopted providing generic principles for IQA processes. Consequently, since 2005, HEIs have been increasingly working on their QA systems (Loukkola, Zhang 2010, p. 35), which has been confirmed by the EQC survey - half of the respondents have introduced their QA systems only after the adoption of the ESG (Loukkola, Zhang 2010, p. 11, 21). Clearly, the ESG have substantially inspired and impacted on the development of QA systems at institutional level (ENQA 2011, p. 23), whether they were in place before 2005 or not (SH-Interview).

#### **Member States have encouraged HEIs to implement IQA systems through formal requirements, most commonly embedded in HE legislation, however rarely making explicit reference to the ESG**

By 2012 in all but four EHEA countries formal requirements on HEIs to establish IQA systems have been introduced, most commonly through HE legislation. The exceptions are Estonia, Slovakia, Ukraine and the United Kingdom. However, in case of Estonia and the UK, the lack of formal legal requirements is just a reflection of these countries' specific legal environment and there are otherwise clear expectations laid out by the national QAAs (EACEA 2012, p. 68).

Seldom, the legislation in place makes explicit reference to the ESG. Available studies suggest that laws to ensure that the ESG are enshrined in the procedures for QA in HE have indeed only been drafted in some national contexts (ENQA 2011), e.g. in the Netherlands and Slovakia (IBAR 2012a). Still, standards from part 1 of the ESG appear to be more clearly defined in the national QA systems for IQA than those in part 2 are for systems of EQA (ENQA 2011, pp. 16–17), mainly because national QAAs tend to define their requirements in accordance with the ESG.

The new legislation, redesigned under the influence of the ESG and other European level policies, has largely served national authorities to emphasise HEIs' autonomy and primary responsibility for HE

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<sup>11</sup> [www.ekspencibolonscy.org.pl/sites/ekspencibolonscy.org.pl/files/2013\\_pl\\_zeszyt\\_dobrych\\_praktyk\\_qa\\_www.pdf](http://www.ekspencibolonscy.org.pl/sites/ekspencibolonscy.org.pl/files/2013_pl_zeszyt_dobrych_praktyk_qa_www.pdf), checked on 23/05/2013

<sup>12</sup> [http://ekspencibolonscy.org.pl/sites/ekspencibolonscy.org.pl/files/prz\\_dobre\\_praktyki\\_200513.pdf](http://ekspencibolonscy.org.pl/sites/ekspencibolonscy.org.pl/files/prz_dobre_praktyki_200513.pdf), checked on 28/05/2013

provision and thus to insist on their greater accountability. Consequently many new QA commitments such as mandatory external evaluations or accreditations have been introduced, inducing further progress at institutional level (ENQA 2011, p. 54). In the past few years, the trend to introduce institutional EQA (in addition to the still predominant programme level EQA), concentrating on the overall institution's enhancement, as well as towards adopting a „lighter touch” approach to EQA instead of a „heavy-handed” quality control has been growing. The lighter approach, aimed to ensure that necessary measures to improve quality have been established within HEIs without, if possible, interfering in the decision-making processes at institutional level (EACEA 2012, p. 61), further empowers HEIs with responsibility for IQA (see chapter 3.2).

#### **Typically the adoption of Standards and Guidelines at institutional level was ensured through EQA**

Typically the adoption of part 1 of the ESG was ensured through EQA standards and processes (ENQA 2011, p.16). Developments at institutional level were significantly influenced by the rapid developments regarding QAAs, especially since 2008 when agencies increasingly started to review their operations against the ESG for ENQA membership and EQAR registration. Since standard 1 of the ESG part II requires agencies to demonstrate that they take into account the effectiveness of IQA mechanisms according to part I of the ESG, the reviews conducted by agencies function at the same time as an indirect driver for implementing QA within HEIs (ENQA 2012a, pp. 3–4).

#### **Various European and national level incentives, projects and organisations, peer influence, as well as international aspirations of HEIs acted as a driver for IQA developments and endorsement of a common QA understanding**

The Bologna Process and subsequent changes in the national frameworks have clearly promoted a growing awareness for QA and a common perception of this concept, which has been further endorsed by the various European level projects, organisations and events, mentioned in this study. In particular, EQAF has been pointed out in stakeholder interviews as a forum for HEIs to compare their QA experiences, emphasise similarities (not differences) and find a point of convergence (SH-Interview).

As indicated by stakeholders during interviews, the increasing international cooperation between HEIs has led to peer-influence to develop IQA systems (SH-Interview). Indeed, there seems to be a strong relationship between the progress in IQA and international aspirations of HEIs, which can be achieved more easily, if HEIs are in a position to demonstrate their quality to their potential partners (SURSOCK, SMIDT 2010, EQC). HEIs, especially from countries with developed IQA systems, such as the UK or Ireland increasingly tend to demand that potential partners have an IQA system in place (S4), partly as a result of QAAs' new scrutiny of international partnerships.

Furthermore, in 2009 EHEA countries declared they had taken action to align their IQA systems with the ESG. The encouragement measures adopted at national level, other than formal regulations, included: engaging in consultations with stakeholders, providing financial incentives (additional funding for creating or developing IQA systems or structures) or mapping QA procedures existing in HEIs (Rauhvargers et al. 2009, pp. 51–52). A number of newer EU Member States chose to fund these incentives from EU Structural Funds, while some countries of Eastern or South-Eastern Europe applied for funding from the EU Tempus Programme or sought loans from the World Bank (Rauhvargers et al. 2009, pp. 51–52). There is evidence these practices have continued to this day.

#### **Consequently, since 2009 the idea of an IQA system has gained ground and been accepted by HEIs**

Stakeholders confirm, there is now less discussion among and within HEIs about the principal need for having IQA systems, than back in 2009 (SH-Interview). This could indicate that, whereas in many systems programme EQA used to be an important initial motivation for the development of QA systems, the willingness from the side of institutions to develop IQA systems has significantly increased.

### **Recent developments in IQA go beyond IQA systems, changing the emphasis towards bottom-up quality cultures**

At the same time, as emphasised in stakeholder interviews, current discussions on IQA has changed their emphasis from „systems” to quality cultures (SH-Interview). The concept of quality culture is considered to be bottom-up (an organisational culture) and therefore puts the stress on regular activities, weeding out the superfluous administrative tasks put in place by top-down IQA systems. „*The movement for quality enhancement has changed the emphasis of the quality efforts back to the classroom and to the teaching and learning processes, with a call for student support, staff development and back to a collegial dialogue regarding learning outcomes, the development of a quality culture within institutions that is about academic values and bottom-up processes*” (IBAR 2012d, p.4).

#### **3.2.2 Have HEIs introduced or developed rigorous IQA systems in accordance with the ESG?**

At the time when the first EU progress report was issued, EHEA countries declared they were coming closer to fulfilling part 1 of the ESG (Rauhvargers et al. 2009, p. 55). Since then the ESG have continued to spread and induce QA of areas that had not always been covered before.

**Most HEIs have IQA systems based on standards consistent with the ESG, but only a minority has systems completely in line with the Standards and Guidelines. The degree of compliance varies significantly across EHEA countries, as well as within national HE systems**

The fact that the ESG have had a considerable impact on the development of IQA systems does not necessarily mean that there is a high level consistency in their application at institutional level (ENQA 2011, p. 22). The analysis of the existing data paints a very diverse picture of the way and extent to which the ESG are actually being addressed, not to mention implemented, within HEIs.

The 2012 *Bologna with Student Eyes* report reveals that only 11 of 25 national student unions consider that in their countries part 1 of the ESG was fully applied (Päll 2012, p. 126). Information from students suggests that while all IQA systems in place are based on standards consistent with the ESG, within all countries there are institutions with systems completely in line with the ESG, as well as institutions where important elements of Standards or some Standards as a whole are lacking. According to the students perspective the latter group is still predominant (Päll 2012, p. 126).

**The reasons behind inconsistent ESG implementation are manifold and reflect the complexity of frameworks in which IQA systems operate**

The reasons behind inconsistent ESG implementation are manifold (Päll 2012, p. 126; ENQA 2011, p. 22) and reflect the different legal frameworks, maturity and traditions in which IQA systems operate:

- **Many HEIs have established their IQA systems only recently and thus may not yet have implemented all the Standards and Guidelines**

There is evidence that in several countries HEIs have only recently started to establish their IQA systems. Half of the HEIs surveyed within the EQC admitted they had introduced their QA systems after 2005, with a considerable portion still being in the planning or introduction phase in 2010 (Loukkola, Zhang 2010, p. 11, 21). Development of an IQA system, especially since it involves cultural change, takes time and resources and cannot be achieved at once. Institutions with longer QA history have usually more mature and comprehensive systems.

- **ESG have often been implemented in HEIs indirectly through compliance with EQA**

The observation made by *Trends 2010* and the EQC survey, confirmed by the MAP-ESG and IBAR projects, as well as stakeholder interviews is clear: HEIs do not necessarily use the ESG directly as their source of reference, when developing their IQA (ENQA 2011, p. 22). Many principles put forward in ESG have been implemented in HEIs implicitly, without direct reference to the ESG. There were often either already traditionally embedded in the existing institutional cultures or had been introduced to the institutions indirectly, through compliance with EQA criteria (ENQA 2011, p. 16; IBAR 2012a, p.4). Since the main concern of many HEIs is to respond to national QA requirements, this might have led to limited awareness or perceived importance of the ESG, especially when no



national discussion of the ESG has taken place or if the QAA did not make an explicit link to the ESG (SURSOCK, SMIDT 2010, p. 87). Consequently, institutions rarely apply the ESGs as an integrated whole, but tend to show interest in one or several aspects of them (Loukkola, Zhang 2010, p. 35).

- **Other developments in HE, external regulations, financial constraints and potential reluctance from the institution's community might also constitute barriers to achieving full ESG compliance**

Additionally, other developments in HE, external regulations, financial constraints, and potential reluctance from the institution's community itself (Loukkola, Zhang 2010, p. 11), discussed further in this chapter, might constitute barriers towards achieving full ESG compliance.

**The ESG may not have yet become the single „common framework” for HEIs across Europe, but they did have an unprecedented impact on harmonising QA at institutional level and fostering a shared, European understanding of IQA**

Bearing in mind that the Standards and Guidelines have not yet been consistently applied in HEIs across EHEA, as well as the fact they are still not widely known within HEIs, it cannot be confirmed that the ESG have indeed become a „common framework” for HEIs across Europe. Nevertheless, the ESG have undoubtedly inspired the developments at institutional level and proved to be a successful reference framework for the implementation of IQA systems (ENQA 2011, p. 16). IQA across EHEA is largely conducted according to the framework of principles they provide (ENQA 2011, p. 23). While two decades ago, the starting positions of various countries and their HEIs were significantly different, due also to historical reasons, the last years have considerably changed the situation in a convergent mode. Despite certain differences, *„we should appreciate how much in common we find comparing the situation and the trends in different countries and different institutions and how much the principles put forward in ESG have been implemented in quality management of studies”* (IBAR 2012a, p. 4).

The ESG were developed in response to the need to create a mutual understanding of how to safeguard quality and to enhance it further, while allowing for national characteristics of HE (ENQA 2011, p. 35). The available evidence suggests, that the ESG have indeed facilitated a common understanding and HEIs across Europe are converging in the ways they conduct QA, although, as argued in this study, they are not always sufficiently aware of it.

### **3.2.2.1 Implementation of Standards and Guidelines from part I of the ESG within HEIs**

**The institutional frameworks (policies and procedures) for IQA systems have been established**

The ESG seem to have had the strongest influence on ensuring that the institutional framework for QA, i.e. policies and procedures are in place. Increased attention for formal policies and procedures has largely been a consequence of the more cyclical character of EQA evaluations, especially since QAAs consider Standard 1.1. „Policy and procedures” as a central part of the ESG (ENQA 2011, p. 53).

Almost all HEIs surveyed by EQC had a QA policy statement (as a separate document or included in another institutional policy) in place which demonstrates a huge progress regarding HEIs strategic and explicit commitment to quality enhancement (Loukkola, Zhang 2010, p. 33-34). As far as strategy for continuous quality improvement is concerned, the 2012 BFUG data suggests that in recent years HEIs have made remarkable efforts to develop this document. 25 countries claim that over 75% of their HEIs have published such a strategy in the past 5 years, with 12 considering this number to be 100%. Since 11 countries estimate that less than 25% of their institutions have published such a strategy, much still however remains to be done (EACEA 2012, p. 68). Procedures for QA are also largely in place, mostly covering the teaching and learning processes (Loukkola, Zhang 2010, p. 33-34). They are often managed at faculty rather than at institutional level, resulting in wider ownership of quality processes and the concept of quality culture reaching down but at the same time not always creating a clear feedback loop to the institution's strategic orientation (SURSOCK, SMIDT 2010, p. 87).

**HEIs monitor and evaluate their programmes in an increasingly systematised and formalised way, however stakeholders involvement in the process requires further development**

As far as Standard 1.2. „Approval, monitoring and periodic review of programmes and awards” is concerned, all HEIs monitor and evaluate their programmes in some way and there is a strong trend to

systematise and formalise those processes. The last available EHEA comparative data suggests that in 21 countries all HEIs have procedures for internal approval, monitoring and periodic review of programmes and awards in place, and in another 20 national systems most HEIs do (Rauhvargers et al. 2009). What constitutes a challenge is the systematic and meaningful involvement of students and external stakeholders in the formal process. Based on the EQC survey, in only 50% of HEIs students are part of the group designing curricula and an even lower number of institutions (40%) involves students in measuring work load via student surveys. The latter is particularly crucial, as a necessary step for implementing correctly the ECTS that build equally upon LO and student workload (Loukkola, Zhang 2010, p.11, 30).

**In most HEIs assessment of students is conducted according to pre-defined and publicly available criteria and methods, and is related to LOs**

In the last few years, Standard 1.3. „Assessment of students” has received a lot of careful attention within HEIs (ENQA 2011, p. 53). Most institutions have a mix of several features as mentioned in the Guidelines (Loukkola, Zhang 2010, p. 34). In particular, assessment methods and criteria are usually made transparent to students (Loukkola, Zhang 2010, p. 11). Moreover, according to the EQC survey, student assessment is in most cases directly related to the intended LO (Loukkola, Zhang 2010, p. 33-34). This indicates a strong link between having LOs and designing the assessment process accordingly, however no further data are in place to back up this claim.

**HEIs have mechanisms to ensure quality of their teaching staff, however good teaching is not always given enough weight in academic promotion and staff-development centres are still a rarity**

Regarding Standard 1.4. „QA of teaching staff”, according to EQC findings, most HEIs have mechanisms to ensure, evaluate and develop qualifications and competences of their academics. Institutions conduct student surveys, periodical evaluations, specify their own recruitment requirements, as well as offer optional (62% of HEIs surveyed) rather than compulsory (26%) pedagogical training (Loukkola, Zhang 2010, p. 34). Many good practices can be identified with regard to this area. „Teaching Quality Awards” granted by student organisations/unions, sometimes institutionalised with the HEI itself granting the awards and the students nominating the candidates, are one of such examples (Gavra 2012, p. 19).

On the other hand the question remains whether the results of QA have a sufficient impact on the decisions regarding staff management and good teaching is actually properly valued. In the majority of countries the legal framework in place foresees the possibility for HEIs to remove an ineffective teacher (Loukkola, Zhang 2010, p. 34). However, even when teaching evaluations are emphasised in academic promotion, research productivity still tends to be given more weight (SURSOCK, SMIDT 2010, p. 86). Furthermore, EQC pointed out, that although staff development schemes are growing, professionally-staffed centres that support teaching and learning are still a rarity. This will require attention in the years ahead, particularly because of the renewed emphasis on the student-centred learning (SURSOCK 2011, pp. 9–10), and since focusing on staff development is a facilitator of introducing strong and vital quality cultures within institutions.

**The majority of HEIs does not conduct systematic and comprehensive evaluations of the learning resources and student support services, which limits the effect QA could have on the overall quality of HE provision**

Standard 1.5. „Learning resources and student support” is indicated by students as one that has received least attention within IQA systems (SH-Interview). Although generally HEIs provide students with learning resources and support services (Loukkola, Zhang 2010, p. 32) such as libraries, computer facilities, laboratories, academic orientation, counselling and advising, they largely do not include them into IQA systems. In 2010, their regular evaluations were conducted by a little more than 40% of HEIs and the longitudinal analysis showed little change in this area since 2007, despite the high number of institutions reporting enhanced quality activities (SURSOCK, SMIDT 2010, p. 86). As pointed out by students, a stronger focus on the regular assessment and improvement of student support services and other characteristic impacting students experience is necessary to assure and achieve the overall quality of HE provision and equal and fair opportunities for students in the EHEA (Bartolo 2010, p. 51).

### **HEIs collect information on their programmes and processes, largely using student surveys, however efficient use of the information gathered remains a challenge**

With regard to *Standard 1.6 „Information systems”*, HEIs seem to be good at collecting information, but still they generally know more about the input to the learning and teaching process, and its course, than about its output, not to mention outcomes (Loukkola, Zhang 2010, p. 11, 37). The majority of HEIs across EHEA use student surveys to gather information on the quality of teaching, although not many conduct them on a systematic basis (Loukkola, Zhang 2010, p. 34). Relatively few institutions track their graduates career paths (SURSOCK, SMIDT 2010, p. 87) missing opportunity to get feedback on the quality of provision and in particular achieved LO. However, the trend for collecting information from graduates is growing, especially since several countries have introduced the requirement to monitor graduates employability in national legislation policies.

The data in place does not allow to report on the scale of HEIs where the information gathered leads to concrete measures and follow-up activities, and where there are mechanisms to ensure an every-day implementation of the PDCA circle. Still, it can be concluded, that efficient use of the information gathered and feeding the QA results to strategic management remain one of the most significant weaknesses of IQA across EHEA (Loukkola, Zhang 2010, p. 11).

### **All institutions publish some sort of information on their programmes and awards, but only a minority makes the QA results publicly available**

Finally regarding *Standard 1.7 „Public information”*, HEIs most commonly publish information on their study programmes, including qualifications granted, the intended LO and the teaching, learning and assessment procedures used within the programme (Loukkola, Zhang 2010, p. 10). The information on alumni employment is rarely featured.

The ESG do not directly stipulate that results of QA should be made publically available by HEIs, however the question whether and to what extent HEIs should improve the quality and accessibility of the information they provide on their performance has become part of the ongoing discussion on the need for increased transparency of European HE. Currently, the number of HEIs that publish critical and negative outcomes of QA is critically low. The large majority of national HE systems (22) state that none of their HEIs publish such reports, and a further 11 report a very low percentage (1 %-25 %). Only eight systems declare to be in the categories ranging between 25 and 99 % (EACEA 2012, p. 69). It indicates that the quality culture has not yet reached a stage where information about the outcomes of QA is made public by the HEIs. On the other hand, the Study's research team is not convinced whether internal evaluations, which are improvement-led, should indeed be publicly disclosed. The desire to keep critical reports as internal working documents is understandable. While the role of EQA is to ensure transparency and accountability, the IQA should be mostly about ownership and participation.

### **HEIs have established or developed IQA systems that take into account aspects of the ESG, but the rigorousness of these systems and their impact on improving quality of HE remains unexplored**

Summing up, QA systems are now largely in place across EHEA and they take into account aspects of the ESG (Loukkola, Zhang 2010, p. , ENQA 2011, p. 21, SH-Interviews). Based on the available data, as well as bearing in mind various possible interpretations of the term „rigorous”, it is not possible to determine whether they are rigorous, not to mention what was their impact on improving quality of HE provision. Easy access to panel reports from EQA, e.g. via an European portal of recognised HEIs (the establishment of which is further recommended in this study), could shed some more light on this topic, since effectiveness of IQA systems is evaluated by QAAs acting in accordance with the ESG.

#### **3.2.2.2 Stakeholders involvement in IQA within HEIs**

Since 2005, the developments regarding QA and governance within HEIs, have lead to a reconfiguration of the roles of internal stakeholders (students, academic staff, administrative and management staff), as well as to an increased focus on the role of external stakeholders, particularly employers and graduates (IBAR 2012d, pp. 4, 8).

### **Senior leaders and staff representatives are involved in IQA processes in most HEIs, but academics often feel side-lined and lack ownership of IQA systems**

The available studies and stakeholder interviews suggest that in most HE systems, in consequence of the more systematic, formalised and top-down approach to IQA, the administrative and management staff have become key actors and change drivers in IQA. In particular, the figure of a "Quality Office" has become common in HEIs across EHEA (IBAR 2012d, p. 4). This is a sign of positive development, indicating that the leaders of HEIs have taken on responsibility for QA and established the necessary structures to develop IQA systems. „*The crucial role of institutional leadership in demonstrating commitment to quality has been taken on board by most HEIs, which have their senior leadership involved in one way or another in QA processes*” (Loukkola, Zhang 2010, p. 10). On the other hand, this significant shift in the balance of power in many European HEIs, has often led to internal tensions (IBAR 2012d, pp. 4, 8-9) and to a not so rare perception that academics were not sufficiently included in IQA or not given the place they deserve within the relevant QA structures (Education International 2012, p. 5).

Indeed, although generally participation of academic staff seems to be systematic and common in all stages, from curriculum design to involvement in formal QA processes (Loukkola, Zhang 2010, p. 10), academics often feel side-lined and excluded from decisions related to the design and implementation of QA processes within their own institutions (Education International 2012, p. 5). In particular, nearly half of the respondents to the EQC survey did not have a committee responsible for QA to ensure wider participation of students and staff (Loukkola, Zhang 2010, p. 10) and in several cases, especially at the early stages of system development, one lone staff member was in charge for IQA processes (SURSOCK, SMIDT 2010, p. 87).

### **Student participation in IQA has significantly increased and is now taken for granted, however the degree and practices of student involvement differ across countries and within national systems**

Increased student involvement has been one of the most positive and undisputed developments in IQA in the past few years. The advancement can be seen since 2005 in the *Bologna With Student Eyes* publications and was strongly confirmed by stakeholder interviews. Clearly, across EHEA student participation at institutional level is no longer a point for discussion and is now taken for granted (SH-Interview). The common trend towards greater student involvement in QA, and generally in the decision-making processes at institutional level, is a reflection of the fact that students are increasingly perceived not only as important stakeholders (key and active actors of the teaching and learning processes), but also as clients and consumers of HE provision, especially since their contribution in the cost-sharing has increased steadily in a number of countries (this is well exemplified for instance in the UK National Student Survey) (IBAR 2012d, p. 4). Students highly value their QA experience and admit it has contributed to enhance their status at institutional level (IBAR 2012d, p.8).

In the reporting period, the number of countries without any or very little student participation in IQA has decreased among the 32 EHEA countries surveyed to respectively 3 (Azerbaijan, Slovakia and Ukraine) and 5. At the same time, according to the student unions' perception, the number of countries where students are highly involved or considered as equal partners in most of the HEIs has increased significantly, when compared to 2009 data (from 9 to 17) (Päll 2012, p. 120). Nevertheless, there is still considerable room for improvement (Gavra 2012, p. 20; Loukkola, Zhang 2010, p. 11), since the degree and practices of student involvement on the institutional level differ dramatically not only across countries, but also within the national systems, from one HEI to another (Päll 2012, p. 120-125). In many HEIs students involvement in IQA processes, although officially in place, is still not active nor genuine, but limited to formal presence and observation, with little real influence over decisions (ESU 2010; Gavra 2012, p. 20;).

In particular, students participation in IQA seems to be less systematic and widespread (in terms of areas and processes in which they are involved) than the participation of academic staff (Loukkola, Zhang 2010, p. 10). There is an impression among students, their participation is relevant and encouraged only in the areas of QA where it is explicitly mentioned in the ESG. The ESG refer to student involvement by using different terms (student involvement, participation, feedback, engagement), which, as experience has showed, can be differently interpreted within different HEIs (ENQA 2011, p. 37) While using generic, non-prescriptive standards and guidelines is in line with ESG philosophy, the

current terminology does not necessarily ensure students are regarded and treated as equal partners at institutional level, nor their participation in all QA areas and processes.

**Lack of visible outcomes of IQA, insufficient knowledge and information on QA, as well as perception that students are not full members of the academic community are main barriers to full student involvement in IQA**

The perception of the QA processes among students is largely influenced by whether they witness and take part in any consequences to the QA processes. If the outcomes are not visible, student interest is bound to decrease. HEIs with a longer history in QA are generally more likely to give importance to the influence of student surveys, as well as to the feedback loop and informing the students about the follow-up of QA activities they participated in (Loukkola, Zhang 2010, p. 10), indicating that genuine student involvement is often a reflection of IQA systems' maturity.

Lack of information among the student body and students not being perceived as full members of the academic community are seen as main barriers faced by students striving for the full involvement in QA processes and practice (Päll 2012, p.123). A staggering number of 15 out of 25 national students' unions report on poor availability or lack of information about QA concerning students in their countries (Päll 2012, p. 125). Furthermore, students full involvement in QA processes is often hampered by their insufficient knowledge of QA methods, tools and practices (S5) The student pools created by national unions and ESU, while primarily serving as a database for student experts to join external review panels, at the same time – through organised workshops and peer-learning opportunities - enhance students' knowledge on QA and thus facilitate their genuine involvement in QA at both external and internal levels (S5)

**Since 2009 the role of external stakeholders in IQA has significantly increased, nevertheless their systematic and meaningful engagement remains challenging**

Since 2009, there has been a strong trend among HEIs to involve external stakeholders, particularly employers, but also graduates and international experts in their IQA processes (SH-Interview). In 2012 National Student Unions reported that in 29% of HE systems, alumni and international experts (whose involvement has been signalled as one of the best methods to spread good practices and increase the credibility of QA, besides contributing to ensuring consistency in implementing the ESG around Europe) participated in IQA, while employers were involved in 39% countries (20% in 2009) (Päll 2012, p. 128) The role of those relatively new stakeholders has lately become an important issue addressed by HEIs while developing IQA systems, however their engagement is still a rather weak point of IQA. The level and nature of external stakeholders participation in QA varies significantly across and within EHEA countries, and is rarely systematic and widespread. In most of the 222 HEIs surveyed within the EQC project, they were involved in QA processes in various ways from sitting on governance bodies to being consulted as sources of information, the latter seeming however to be the more common (Loukkola, Zhang 2010, p. 10). For most institutions, finding meaningful ways to engage external stakeholders is still challenging (S4).

During stakeholder interviews employers' involvement has been emphasised as crucial, not only by providing the external perspective and communication with the labour market, but also since they insist on highest quality of HE provision and on using international benchmarks (SH-Interview). Tighter cooperation with employers may also enhance their trust towards IQA processes, which seems to be limited in a number of countries. The fact that, for example in Germany, 75 % of study programmes are accredited under conditions, makes some employers doubt that HEIs will be able to do better on their own when nobody is „controlling” them (SH-Interview).

### 3.2.3 Challenges regarding IQA development

The following list is far from being exhaustive and neither is it applicable as such to any HEIs, since the case of each institution is different. Nevertheless, based on the available studies and stakeholder interviews these are the areas where many HEIs are still struggling when it comes to IQA.

- How to increase ownership of the IQA system among academics and develop a quality culture

**The biggest challenge has not changed since 2009 and is still how to ensure that IQA encourages genuine engagement of the academic community and development of a strong quality culture**

As emphasised during stakeholder interviews, the biggest challenge and unsolved task for institutions has not changed since 2009, and is still how to ensure that QA is not only about bureaucratic processes and producing reports, but encourages genuine engagement of the academic community and development of a strong quality culture (SH-Interview), thus ensuring high quality provision. Moreover, stakeholders emphasised that in order to build effective IQA its purpose needs to be defined, and this can solely be done by the HEI itself together with students and the regional labour market (SH-Interview).

**Within institutions, IQA is still regarded more as a top-down and administrative task rather than the heart of the matter for academics**

In many HEIs implementation of IQA systems, while reinforcing IQA, has also brought on negative consequences associated with top-down processes and organisational cultures characterised by compliance and formalism, rather than genuine improvement of teaching and learning. In the past few years the tensions between academics and management and administrative staff involved in IQA, originated by an often paradoxical separation between QA procedures and the actual teaching and learning processes („as if what goes on in the classroom is actually kept apart from the whole QA system”) (IBAR 2012d, p. 4, 8-9) have become a reality within many institutions across EHEA. Academics, while considering QA as a positive development (Education International 2012, p. 6) do not have the perception that in the current format it is actually protecting and enhancing quality or supporting their work and criticise the steering effect in which institutions just attempt to do better according to a narrow set of indicators (Education International 2012, p. 6).

This phenomenon was clearly visible in the results of an EURASHE survey, conducted within MAP-ESG, regarding ESG usefulness for different institutional actors. Majority of respondents answered that the ESG are most useful to the QA officers (61%) and the Board of Directors/the Management. Usefulness to academics was only considered by 12%, which was lower even than for the administrative staff (16%). Usefulness to students, alumni, employers was rated below 10%. These results may also indicate that although the ESG strongly advocate the stakeholders' model and the participation of students and staff, they are not focused enough on their role in IQA.

The fact that HEIs largely followed national regulations to develop their IQA systems has often raised additional concerns and has led to a not so rare reaction within HEIs that these are externally-imposed requirements rather than instruments owned by academics and learners to develop a quality culture. Since 2009, HEIs have strengthened their efforts to cope with and manage these tensions (IBAR 2012d, p. 8). Stakeholder interviews confirm much has happened to change the focus from top-down IQA systems to more bottom-up processes and that there is a growing awareness that HEIs should care more about the individual members of the academic community (SH-Interview).

**HEIs lack practical advice on how to develop strong quality cultures in line with the ESG**

Many HEIs draw attention to the fact that although the generic European and national frameworks for QA are now in place, there is not enough practical advice on how to develop a strong quality culture in line with the ESG. Without such support, more often than not, quality culture is replaced by introduction of more top-down control and more bottom-up paper reports (IBAR 2012a, p. 12).

- How to close the feedback loop

Closing the feedback loop has been indicated by stakeholders as a challenge and area for further development (SH-Interview) in order to foster continuous development and contribute to stakeholders'

engagement (as described earlier without visible outcomes of IQA students, and other stakeholders, are less willing to participate). Better implementation of standard 1.6 can help to better link and explore QA outcomes to quality of HE provision.

- How to incorporate Qualification Frameworks and learning outcomes into IQA

**The most profound impact on IQA came along with the need to design curricula from a student perspective with LOs and ECTS as main pillars.**

Notwithstanding the role of ESG in shaping internal QA processes, it seems that the most profound impact on IQA, especially in the area of programme design, came indeed from Qualifications Framework and the ECTS which stipulated that curricula should be designed from a student perspective, with LOs and student workload as main pillars (Westerheijden, et al. 2010b, p. 36). The process of redesigning curricula according to this new approach definitely dominated the IQA activities in European HEIs since 2009, widely engaging the academic community.

**Most HEIs managed to define LOs for their programmes but implementing this new approach into the teaching and learning process and aligning it with IQA systems remains a great challenge**

The EQC project suggested that most of the responding HEIs have defined explicit LOs for all or some study programmes (Loukkola, Zhang 2010, p. 11). Simply describing the LO is however the „easy” part (Rauhvargers et al. 2009, p. 56). The challenge remains to implement them in practice into the teaching and learning process, including student assessments, as well as to incorporate them into the institutional QA system (Bologna Working Group on Qualifications Frameworks 2012, p. 22). There is evidence across EHEA that HEIs started to introduce procedures and systems to measure achievement and quality of the LO, however the available studies do not provide any EU-comparable data on these practices. Stakeholders confirm that there are HEIs which have been linking QA to other Bologna lines, often at their own initiative (S6) and that thorough implementation of LOs throughout the institution remains a challenge for many HEIs (SH-Interview).

**Using LOs and QFs to facilitate recognition, transparency and communication with stakeholders is a recent trend that needs further enhancement**

On the other hand, greater use of the defined LO and Qualification Frameworks has been indicated as an important recent trend in stakeholder interviews (SH-Interview). It seems that LO have become the lingua franca of HE, facilitating transparency and communication with external stakeholders. QFs, on the other hand can help institutions to find their own place within the wider HE system and help employers to understand this relation as well. However, there is not yet a direct link of QA or LO to QFs (SH-Interview).

**Within institutions the ESG document is still relatively unknown**

Finally, regarding awareness of the ESG, much remains to be done. Although the knowledge of the ESG among HEIs has undoubtedly increased (Päll 2012, p. 126), there are voices that this relates mostly to the people from the QA „inner circle”. Awareness amongst academics and students, apart from those directly involved in QA work, remains very low (ENQA 2011, p. 22.). The importance of raising awareness and ownership of the ESG has been raised during stakeholder interviews. It has been pointed out that low ESG awareness may become a significant barrier to developing a common European QA dimension, since by not knowing the ESG, HEIs and their communities may lose sight of what EHEA countries have in common and be more reluctant to trust and recognise other HEIs (S3).

## **Recommendations**

1. The ESG and their revision should be more actively promoted within HEIs to ensure a greater understanding of how national and institutional QA developments are linked to the common European ones. Institutions should use the revision process to ensure greater ownership of the ESG.
2. HEIs and QAAs should work together on building a partnership to ensure effective QA. This partnership should create space and trust for critical self-reflection, which is a prerequisite for change and improvement. Trust could be increased through confidentiality of institutional self-

evaluation reports and developing external QA processes that are based on incentives rather than sanctions.

3. QA should be inclusive. HEIs must engage the whole academic community into developing a common quality culture and not just consider QA as the special purview of a specific QA unit. Wide engagement and ownership can be ensured through greater focus on teaching staff development, student support services and institution wide debate and open dialogue on quality, with students and academics voices treated equally. QA agencies should revisit their standards and processes with the aim to find ways in which they can encourage institutions to adopt this approach. The ESG revision should also explore new ways on how to promote wide ownership and participation of the academic community in IQA.
4. EC, Member States, QAAs and HEIs should foster genuine student engagement, also by supporting ESU and national student unions in developing Student Expert Pools.
5. To close the feedback loop and reduce bureaucracy of IQA, HEIs should focus on developing simple and effective internal decision making processes and structures for IQA, with clear accountability lines and responsibilities at all institutional levels. A balance should be sought between the need for a strong institutional core and the degree of faculty autonomy and responsibilities for QA.
6. To ensure good intelligence, HEIs should use a mix of several instruments related to institutional strategies and academic values to collect information on the quality of their programmes, LOs, teaching and learning process and other elements impacting on students learning experience, including student support services. HEIs should review regularly their costs and benefits (e.g. whether they lead to unnecessary stress or unreasonable workloads) and whether they really contribute to the improvement of HE provision.
7. HEIs should combine their IQA with LO and QFs since *„applying compatible QA systems does not guarantee the delivery of compatible quality of education. This must result from combined meaningful LOs (ECTS) and qualifications frameworks (QF-EHEA and NQFs)“* (Westerheijden, et al. 2010b, p. 36).
8. To support HEIs in developing effective IQA systems linked with LOs and QFs, inter-institutional cooperation, study visits and other peer-learning and information sharing activities should be catered at both national and European level, possibly with EC assistance. Platforms for both horizontal and vertical communication and dialogue on IQA should be established or further developed at all levels: within institution between departments, within a country between institutions, at European level between both HEIs and QAAs. In particular, establishing or further developing national level equivalents of the E4 group would be beneficial.
9. It is difficult to bring „quality culture“ into HEIs from outside, however the existing motivation to develop one can be guided and supported by external experts. In response to HEIs' need for more practical advice on IQA implementation, national governments, possibly with the help of the EC, should establish capacity building programmes and provide financial incentives for institutions looking for professional advice, expertise, strategic guidance or process skills.
10. Systematic comparative research on IQA (including its impact on improving quality of HE) would be helpful to build expertise in this area.
11. A study on the degree of implementation of the LOs in HEIs, to shed light on this crucial issue, could be beneficial to their implementation.
12. A study on the kind of implementation of QFs in HEIs, to learn more about these challenges would be beneficial to support institutions and programmes in their attempt to use QFs.

Recommendations made in other chapters of this Study, especially in the next chapter, related to IQA, and to the role of other Bologna action lines in IQA in particular, should also be taken into consideration as far as further development areas regarding IQA are considered.



### 3.3 WHAT WERE THE DEVELOPMENTS REGARDING EXTERNAL QA?

It must be said that it is difficult to study development patterns in QA systems because until today, the only regular systematic survey on national QA systems are the BFUG reports. However, these suffer from the fact that they rely exclusively on data provided by the national Bologna Follow-Up Groups, which suffer from a known variety in accuracy. ENQA, the organisation most likely to be aware of national QA systems, does not maintain a systematic monitoring. Its external reviews of agencies do not contain sufficient information about national QA systems and are not systematically analysed by ENQA. The project most closely reassembling a systematic monitoring, ENQA's „Quality Procedures in the European Higher Education Area" (ENQA 2012, p. 150), is focusing on QAA's procedures and good practices rather than on national QA systems. The second problem with creating an up-to-date overview is that the area of QA is characterised by a high degree of dynamism so information is often already outdated when it has been collected, analysed and published.

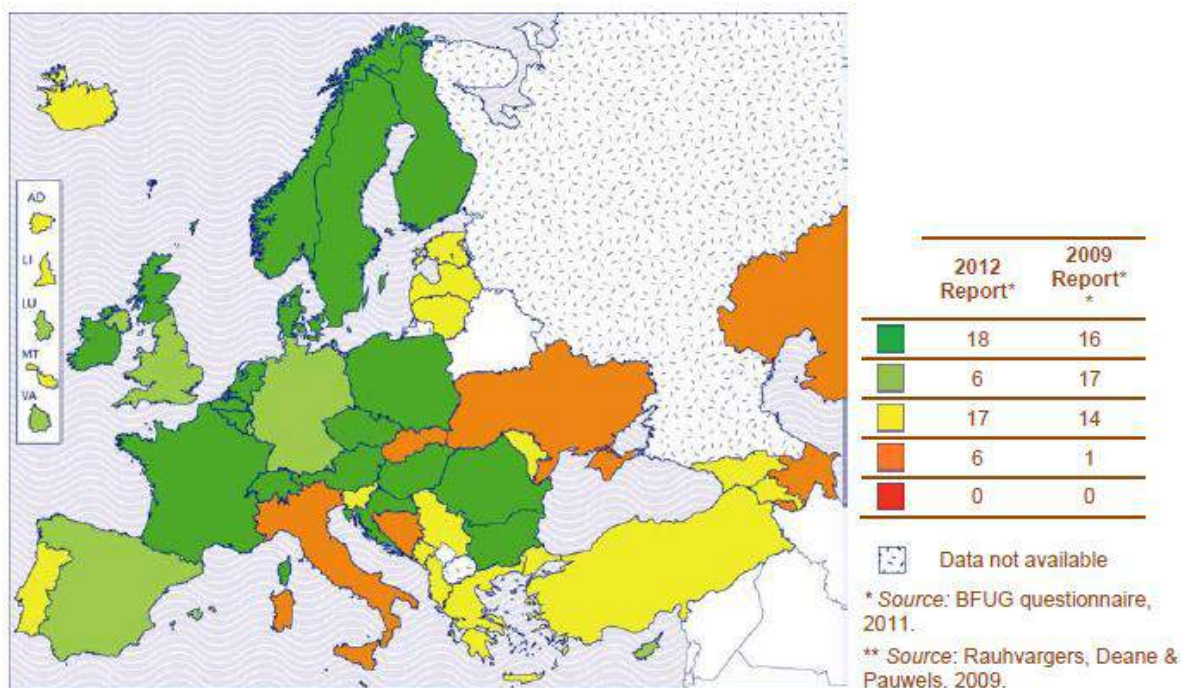
On a general note, in some countries, QAAs enjoy a high degree of autonomy to define the scope and type of their activities, while in others they are explicitly limited to the activities and procedures specified for them by their pertinent legislation. It is therefore impossible to analyse changes in their activities independently of the changes in the legislative framework in which they operate. The lack of an explicit distinction between national QA legislation and the procedures of QAAs in the ESG is also one of the problems discussed in all stakeholder interviews. In the following sub-chapter the relationship between both levels will be further discussed.

#### **Recommendation**

There should be – in cooperation with ENQA, EQAR and the BFUG – more research done on national QA systems. One systematic format of data collection could replace different und unconnected research strands

### 3.3.1 General development patterns in EQA systems in the EHEA - Have QAAs changed the scope and/or type of their activities?

The 2012 Bologna Process Implementation Report analysed national QA systems according to their scope (percentage of institutions and programmes within QA system), their depth (encompassing teaching, student support, IQA or only some of these), the existence of QAAs and whether they were successfully evaluated against the ESG (see Figure 2).



#### Scorecard categories

- A fully functioning quality assurance system is in operation nationwide. The QA agency/ies has/have been successfully evaluated against the European Standards and Guidelines in the EHEA. The QA system applies to all institutions and/or programmes and covers the following main issues:
  - teaching
  - student support services
  - internal quality assurance/management system
- A fully functioning quality assurance system is in operation nationwide. The QA agency/ies has/have been successfully evaluated against the European Standards and Guidelines in the EHEA. The QA system applies to all institutions and/or programmes and covers a subset of the main issues.
- A quality assurance system is in operation nationwide. The QA system has not been evaluated against the European Standards and Guidelines in the EHEA. The QA system applies to all institutions and/or programmes and covers teaching, student support services and internal quality assurance/management.
 

OR

 A quality assurance system is in operation at the national level. The QA system has been successfully evaluated against the European Standards and Guidelines in the EHEA. The QA system applies to some institutions and/or programmes and covers subset of the main issues.
- A quality assurance system is in operation nationwide. The QA system has not been evaluated against the European Standards and Guidelines in the EHEA. The QA system applies to all institutions and/or programmes and covers a subset of the main issues.
- A quality assurance system is in operation nationwide. The QA system has not been evaluated against the European Standards and Guidelines in the EHEA. The QA system applies to some institutions and/or programmes and covers a subset of the main issues.

Figure 2: Development of external QA systems. Source: EACEA (2012)

The report shows no countries in the red zone, which would indicate the absence of an adequate QA system. Six countries find themselves in the orange zone. The countries in this category have established national QAAs or other bodies with responsibility for QA, but these have not yet been evaluated against the ESG. Moreover, the system does not cover all of the key QA issues. Seventeen countries are in the yellow zone. These are all countries that have a comprehensive QA system in place, covering all priority

aspects of QA. However, their agencies have not yet been successfully evaluated against the ESG. Six systems are currently in the light green and 18 in the green zone. In both cases, a comprehensive QA system is in place, and it has been evaluated against the ESG. The difference between these situations concerns the coverage of the QA systems, as one of the main elements of QA (teaching, student support and IQA) is missing in the countries in the light green zone (EACEA 2012, p. 65).

In particular, the following patterns on the level of QA systems can be observed:

**All EHEA countries have some form of EQA system. A large diversity persists with predominance on programme level accreditation procedures**

Although practically all EHEA countries have established some form of EQA system, there are significant differences in the philosophy and approach behind systems. Despite the adoption of the ESG, systems are indeed still quite diverse in their orientation (EACEA 2012, p. 60). Most QA approaches mainly focus on teaching/learning while student support services and research are rarely included (EACEA 2012, p. 10). The predominance of EQA at the programme level and the spread of accreditation have continued to this day (SURSOCK, SMIDT 2010; Päll 2012, p. 119). Indeed, the 2010 report by Education International pointed out that *„three-quarters of countries – including those that have most recently established their EQA system – have constructed their QA systems in the logic of supervision and ensuring minimum standards, while only 14 HE systems currently follow an improvement-oriented approach, placing the primary responsibility for improving quality at institutional level”* (Education International 2010, p. 27). One may argue that programme-accreditation may also be improvement-oriented and indeed, in practice it often is. There is, however, a pattern that programme-accreditations focus more strongly on meeting standards, while institutional approaches focus more strongly on processes to maintain and raise them. Stakeholders emphasise that starting out with programme-oriented accreditation procedures is helpful for HEIs to benchmark themselves in the early stages of QA (SH-Interview). Another reason is that most authorities / QAAs want to look into programmes at least once before they implement institutional approaches.

**Initially, greater HEI autonomy tends to incur more external supervision**

One consequence of the ESG was that in most countries, supervision has shifted from the government to agencies. The pattern of QA systems starting out in the logic of supervision and ensuring minimum standards can be attributed to the philosophy of new public management, which cedes a higher degree of autonomy to institutions, while at the same time increasing accountability requirements. In this logic of governance EQA is linked to internal QA through setting a legal framework and an incentive structure through funding and sometimes various levels of degree awarding powers.

**Where national QA systems invest QAAs with the power to grant permission to operate, there tends to be a more supervisory assurance of minimal standards, though not necessarily related to funding**

Some QAAs are invested with the power to grant permission to operate for institutions or programmes, although certain national system features make this reality more complex (EACEA 2012, p. 60). In systems where responsible QA bodies/agencies have the power to permit or refuse programmes and/or institutions to operate, or where they advise governments on such decisions, QA can, in broad terms, be perceived as supervisory in character. In these cases, it generally aims to ensure that minimum quality thresholds are met (EACEA 2012, p. 61). It is also interesting to note that not all the EQA activities by „supervisory” agencies have an impact on the funding of institutions or programmes. Indeed, only in four systems (Bulgaria, Cyprus, Germany, and Liechtenstein) there is currently no impact of evaluation on funding. In Poland recent legislative changes have added the possibility for additional funding to be granted to programmes considered to be of outstanding quality on the basis of QA. Conversely, some of the enhancement-oriented agency processes may have an impact on funding. This is the case in France, Luxembourg, and the United Kingdom (EACEA 2012, p. 61).

**QAAs have seen the demands on them expand – making quality enhancement and accountability even more difficult to reconcile**

Already in 2009 there was a trend that most agencies were increasingly being asked to also *„review indicators concerning social dimension, lifelong learning, internationalisation, etc. and probably feel overloaded because of that”* (Rauhvargers 2012, p. 23). According to some stakeholders, governments

increasingly require QAAs to take into account during their evaluations legal requirements such as access to higher education, credit allocation, the workload of the thesis, the amount of teaching staff with a PhD, etc., on the basis that these elements give an indication to the quality of higher education provision or to ensure compliance with national policy priorities. Stakeholders from QAAs, however, often perceive this as an additional burden on QAAs which makes it more difficult for them to support quality enhancement.

Furthermore, the discussion on the role of quality assurance in ensuring transparency, accountability and quality enhancement has not been resolved either. Some stakeholders argue that it is unreasonable to expect those responsible for quality enhancement to be equally good in reporting and managing information systems.

In summary, it is clear that any additional goal of QA will reduce the fitness-for-purpose of any particular QA procedure for any single one of these goals. Regarding QA's transparency function, it is widely accepted that the transparency of evaluations should be increased, but a challenge remains in ensuring that reports are well-written, concise, understandable and relevant for a broader range of stakeholders, including students and parents. A possible solution might be shorter executive summaries which are readable and understandable for the general public.

In summary, national QA systems should try to make the goals of their QA systems explicit, more clearly delineate transparency, accountability and quality enhancement, and analyse how other instruments such as transparency tools, statistics and reporting systems could alleviate QA of some of the demands placed in it.

**There are developments towards more institutional, „light touch”, and enhancement-oriented QA systems. The vast majority of QA systems now focus on a combination of institutions and programmes and have a tendency to increase in complexity**

While there still seems to be a predominance of accreditation at the programme level (SURSOCK, SMIDT 2010), in some countries (e.g. Ireland, UK) there have been moves towards differentiating „lighter touch” and more „heavy-handed” quality control procedures within the same HE system. As mentioned above, a common development pattern seems to be that new agencies start out with a programme-oriented accreditation system (such as Italy, Portugal and Spain as recent examples). Then, over time, this often evolves to an institutional focus (EACEA 2012, p. 72). Often, the transition from a programme-oriented to an institution-oriented approach is gradual through the step-wise introduction of institutional elements (e.g. „systems’ accreditation” in Germany, institutional reviews in Flanders). This lighter approach aims to ensure „*that necessary measures to improve quality have been established within institutions*” without, if possible, interfering in the decision-making processes at institutional level (EACEA 2012, p. 61). In other words, it empowers HEIs with responsibility for QA. Certainly, in the systems with an institutional focus, QAAs role is not entirely advisory. It does, however support quality enhancement to a greater extent, acknowledges institutional autonomy and not to mention eliminates the heavy administrative burden, most often associated with regular programme accreditation, from institutions and the entire HE system (EACEA 2012; Westerheijden et al. 2010b). The „light touch”, improvement-oriented approach is more likely adopted by QAAs acting in compliance with the ESG and associated with institutional accreditation (EACEA 2012, p. 61). It is noteworthy that the vast majority of QA systems now focus on a combination of institutions and programmes (69%, n=24) rather than only on programmes (20%, n=7) or only on institutions (11%, n=4). This picture suggests that QA systems are becoming more complex as they evolve (EACEA 2012, p. 62), which is confirmed by various stakeholder organisations. QA systems seem to be more likely to add new procedures than to abolish old ones. However, no case is known of a country which has had its QAA for some time and then moved back from an institutional to a programme-focus.

**In several European countries, the focus of QA is shifting away from input-centred criteria and teachers’ activities towards intended and achieved LOs, student assessments and experiences**

In many countries there has been new national legislation since 2009 and many QAAs have changed their approaches and methodologies which, in turn, is influencing HEIs to change their procedures. Latest TRENDS report shows that QA is seen as the most influential development in the eyes of HEIs.

In several European HE systems, the focus of QA is shifting away from input-centred criteria and teachers' activities towards intended and achieved LOs, student assessments and experiences. In some countries even accreditation moves beyond a mere confirmation of compliance with minimal standards. This is true e.g. for Sweden (Westerheijden et al. 2010a, p. 152), Spain (Westerheijden et al. 2010a, p. 159) and Poland, but especially the Netherlands and Flanders, which use the „Principles regarding learning outcomes in accreditation procedures”<sup>13</sup> developed by the European Consortium for Accreditation in higher education (ECA). Moreover, in the Netherlands „the accreditation process since some years includes the option to publicly recognise special probes of study programmes and the assessment of special qualities of programmes. Institutions may obtain „special marks” as a quality label for their effort to exceed the threshold of standard quality or to show quality on aspects not part of the standard criteria. In addition, the research Master programmes could be seen as a „special mark” accreditation. This practice shows that accreditation is not just setting a basic standard, but includes stimuli for improvement and profiling” (Westerheijden et al. 2010a, p. 43).

The following examples give a short insight on how European QAAs (all ECA organisations) apply the principles on LOs in their EQA procedures (ECA 2013):

1. In the **NVAO** procedure an assessment panel first judges whether a programme's intended LOs are in line with the required level and the subject of the programme as described by the corresponding descriptors in the NQFs (which in turn is referenced to the Dublin descriptors). NVAO then assesses how well the teaching and learning environment and the content of the curriculum is suited to achieving the intended LOs. Thirdly, NVAO assesses the achieved LOs by scrutinising students' work (such as essays, end of term papers and theses). For this, NVAO has produced specific guidelines outlining how panels assess final projects (ECA 2013, pp. 49-52).

The overall procedure (from intended LOs, over the teaching and learning process, to the achieved LOs) has proven to be sound and comprehensive and constitutes a good practice example for integrating LOs and QFs into QA.

2. **PKA** applies a methodology very similar to the one used by NVAO at programme level assessment. Panel experts check whether LOs designed by the HEI are publicly available and consistent with NQFs, but also (in case of certain types of studies) with so called example (standard) descriptors drawn up by the Polish Ministry of Science and Higher Education, requirements set by professional associations and/or requirements formulated for a specific discipline of science. Further, they assess, whether the curriculum enables achieving every intended LO and whether LOs, curriculum, modules, courses and didactic methods are coherent. In addition, PKA evaluates the conditions in which LOs are being delivered (e.g. quantity and quality of staff, teachers/students ratio), the quality of didactic and scientific infrastructure required to achieve LOs, as well as the system of supporting students in their learning processes. Finally, HEIs are expected to present to the Panel a system confirming that the intended LOs have been achieved at each stage of education. At the same time, experts directly assess a randomly chosen sample of student work for achieved LOs, e.g. exam papers (final, mid-term), student projects, recorded presentations, diploma theses etc., and wherever possible - the student portfolio. Assessment of LOs in relation to employability and labour markets needs is based on the outcomes of monitoring professional careers of alumni (which is mandatory for all HEIs). LOs are also taken into consideration during institutional level EQA: via direct assessment of intended and achieved LOs for doctoral (third cycle) and postgraduate studies, as well as indirect (by checking whether the institution has an effective IQA system able to ensure, monitor and evaluate the achievement of LOs (for all programmes offered), as well as e.g. holds sufficient staff, material and financial resources to meet its strategic goals and achieve LOs) (ECA 2013, pp. 55-57).
3. **CTI** itself defines the general intended LOs of all engineering degree programmes, as well as provides HEIs with a self-evaluation guide on programme specific LOs. During the EQA procedure,

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<sup>13</sup> <http://www.eaconsortium.net/main/documents/main-documents> (last visited on April 27)



CTI checks whether intended LOs are in adequacy with these requirements, as well as at the adequate level of European QFs. Then, CTI checks whether the institution has at its disposal the necessary human and material means to carry out the teaching and learning activities and verifies the coherence between the specific identity of a programme and its LOs. Moreover, LOs are evaluated against professional requirements and industry expectations, by a specialist in the evaluated engineering field, being a Panel member. CTI checks whether the intended LOs have been achieved, both at module and programme level, at short, medium and long term. It is done mainly via documentation analysis (e.g. examination subjects, project reports) and confidential meetings with internal and external stakeholders. A specific focus is put on the link between LOs and employability (ECA 2013, pp. 37-40).

4. In case of **EVA**'s programme accreditation, the panel assesses alignment of intended LOs with NQFs and looks at correspondence between module- and programme-level outcomes. Besides, the Panel assesses if organisation of the program, the qualifications and competences of the teachers, the applied methods of teaching and learning and the content of the modules all together support achievement of the intended LOs. Adequateness of student assessment to the LOs is also covered by the procedure, the same as analysis of the actual grades given to the graduates. Furthermore, the expert panel looks at how the institution uses external examiners' evaluation reports for quality improvements (ECA 2013, pp. 40-43).

More information on the above mentioned practises, as well as further examples (e.g. ANECA, FH-Council, OAQ, AQU Catalunya) can be found in an ECA document „Learning Outcomes in Quality Assurance and Accreditation. Principles, recommendations and practice” which will be published in June.

### **There is a growing understanding that QA must be integrated with the other BP action lines**

The ESG were developed in 2005 without much consideration about the other action lines of the Bologna Process. However, issues of quality, recognition, qualifications frameworks, learning outcomes and related instruments such as ECTS are all interlinked in the daily practice in HEIs. There is awareness that this connection must be made visible in the revised version of the ESG.

### **Several agencies have expanded their scope beyond HE**

A number of QAAs have expanded their scope beyond HE. In Spain, it is suggested to include vocational education in the scope of the quality assessment agencies such as ANECA (Field, Kis & Kuczera, 2012, p. 25). More and more QAAs are including level 5 (short cycle or associate degree) into their system. In Ireland, Quality and Qualifications Ireland was established on 6 November 2012 by an amalgamation of four bodies that have both awarding and QA responsibilities: the Further Education and Training Awards Council (FETAC), the Higher Education and Training Awards Council (HETAC), the National Qualifications Authority of Ireland (NQAI) and the Irish Universities Quality Board (IUQB). The new Authority will assume all the functions of the four legacy bodies, thus encompassing all areas of education as covered by the Irish National Framework of Qualifications<sup>14</sup>.

### **3.3.2 Have agencies cooperated and/or merged with other, foreign or domestic, QAAs?**

Since the Bologna Process was launched 22 countries have established national agencies for QA, with half of these being set up since 2005 (Eurydice, 2010). Eleven countries in the EHEA do not have established QAAs. These include those with a small HE sector such as **Andorra, Liechtenstein, Luxembourg and Malta**. However, in these countries, the small size of the sector does not mean that QA is neglected (EACEA 2012, p. 60). Rather they organise external QA and international participation in other ways, such as admitting foreign QAAs (Rauhvargers et al. 2009, p. 14).

In a few countries, such as **Portugal and Italy**, new agencies have replaced or built on the existing ones (EACEA 2012, p. 60). In **Ireland**, Quality and Qualifications Ireland was created by merging four pre-

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<sup>14</sup> <http://www.qqi.ie/Pages/National%20Framework%20of%20Qualifications.aspx> (last visited on April 27)

existing agencies responsible for different sectors in education. In **Austria**, AQ Austria was created by merging three agencies formerly responsible for public universities, universities of applied sciences, and private universities. In **Belgium**, VLIR and VLHORA have merged in to VLUHR. In **France**, AERES replaced several institutions in France: the National Committee for the Evaluation of Public Scientific, Cultural and Professional Institutions (CNE), the Scientific, Technical and Educational Mission (MSTP) and the National Committee for the Evaluation of Research (CNER). In addition, it took over the responsibility for evaluating research units that until then had been carried out by commissions within each research organisation (CoNRS, INSERM's specialized scientific commission, etc.). In **Denmark**, EVA (HigherEd unit) and ACE have just merged. In **Moldova**, the government is currently in the process of drafting a new law on HE which foresees the creation of an agency working in accordance with the ESG.

Regarding agency cooperation, formalised cooperation on the level of procedures is happening within the framework of ECA. In addition, there are several other examples, like CTI and AEQES, where CTI in cooperation with AEQES assessed the engineering programmes in French speaking Belgium.

### 3.3.3 Have external QAAs substantially complied with the ESG?

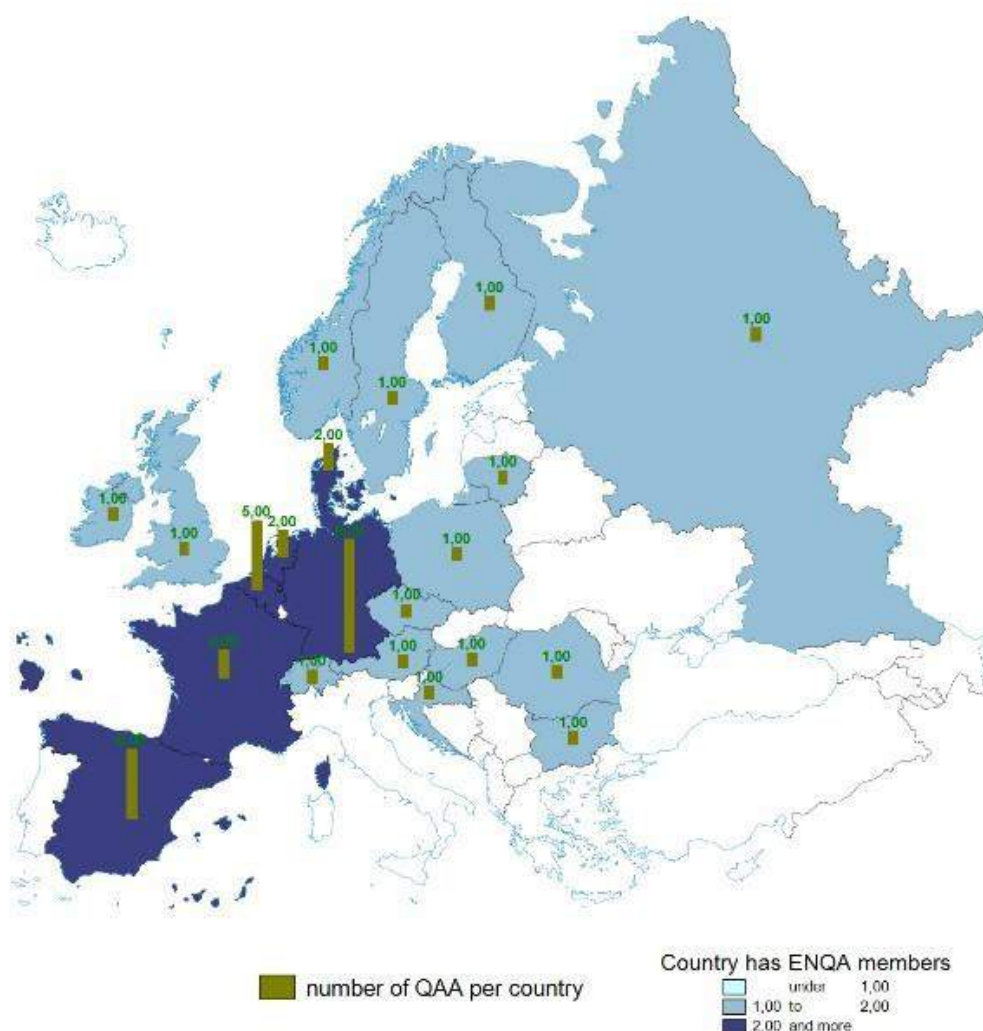


Figure 3: ENQA-registered QAAs in Europe<sup>15</sup>

<sup>15</sup> Countries in each category with EHEA country code: under 1.00 (none); 1.00 to 2.00 (AT, BG, CH, CZ, FI, HR, HU, IE, LT, NO, PL, RO, RU, SE, UK); 2.00 and more (BE, DE, DK, ES, FR, NL).

## **ENQA and EQAR saw a substantial increase in membership**

Agency compliance with the ESG is most often evaluated during the process of recognition by ENQA or EQAR. As of March 2013, there are 39 full members in ENQA, 37 agencies based in 20 countries and two European members, the Institutional Evaluation Programme of the EUA<sup>16</sup> as well as the European Council on Chiropractic Education. In 2009, 31 agencies based in only 19 countries were full members of ENQA, documenting a 26% increase in full QAA membership over the last three years.

During the first two application rounds for EQAR, of the 13 applications 9 were accepted by the Register Committee (EQAR 2010). By the end of 2012, 39 agencies have applied for inclusion on EQAR (Tück 2013, p. 2) and 32 (82%) applications were approved. There are now 28 agencies based in 15 countries on the Register (Tück 2013, p. 2), which is an increase in absolute numbers of 211% over the last three years.

## **However, many countries still do not have a QAA which has been assessed against the ESG**

Even taking into consideration that 11 (23%) countries in the EHEA do not have established QAAs (EACEA 2012, p. 60) this still leaves, 27 EHEA countries with no full member QAAs in ENQA (43%) and 32 EHEA countries with no listed agency in EQAR (68%), which suggests that the ESG may still not be fully implemented a number of countries since 2009. It is obvious that for those agencies, which do apply for membership/listing, the large majority of both ENQA and EQAR applications is approved, albeit sometimes only after asking for further clarification and in a larger number of cases, with recommendations for improvements, often with the request for progress reports in two years' time.

## **Full compliance against the ESG part III varies according to the standards**

ENQA analysed the evaluation reports of 33 QAAs reviewed between 2005 and 2009. The findings reflect various degrees of „compliance” with the ESG. The standards 3.2 (Official status) and 3.3 (Activities) presented agencies with the fewest challenges. Full compliance against the other Standards was, however, achieved less often, specifically:

- Standard 3.1 (Use of EQA procedures): 68% full compliance;
- Standard 3.4 (Resources): 66% full compliance;
- Standard 3.5 (Mission statement): 66% full compliance;
- Standard 3.6 (Independence): 61% full compliance;
- Standard 3.7 (EQA criteria and processes used by agencies): 58% full compliance and
- Standard 3.8 (Accountability procedures): 65% (Crozier et al. 2011, p. 3).

The data provided by the European Students Union's QUEST project supports these findings: In 18 out of 25 countries the national students' unions consider that the ESG are known and taken into account by the QA bodies/agencies and in 13 out of 25 by the national authorities (ESU, 2012). Still, in 6 cases, the students consider that there is a reluctance to apply them by the QA body/agency or that the ESG are not known (Päll 2012, p. 126). 14 national students' unions consider that Part II of the ESG is not fully applied, which is in accordance with the BFUG report (EACEA, 2012, p.66). EQAR suggests that about four years after the adoption of the ESG, many QAAs have aligned their methodology and processes with the ESG and use them as a central reference point in their work. Most agencies are well aware of the areas where compliance with the ESG could be improved and are currently striving to take the necessary steps (EQAR 2010, p. 45). Some agencies already organise feedback from other QA agencies on ESG alignment of their new methodologies before they organise a stakeholder consultation. So, indeed, the ESG have become a strong framework of reference for QAAs. **Nearly all agencies publish some form of assessment results, but their depth and detail varies greatly**

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<sup>16</sup> Even though the IEP is officially based in Switzerland, it was listed in Belgium as the list was created based on each QAA's contact details.



The ESG 2.5 state that „Reports should be published and should be written in a style, which is clear and readily accessible to its intended readership. Any decisions, commendations or recommendations contained in reports should be easy for a reader to find”. Out of 47 QAAs, 36 (77%) stated that positive outcomes of QA evaluations are made available to the public (Rauhvargers et al. 2009, p. 8). However, in 2009 EQAR reported that not all QAAs publish full reports of their reviews, some agencies do not publish information in cases where accreditation is denied, some only publish summarised reports or reasons on their website. Very few QAAs publish the full reports written by the assessment panels. Bearing in mind that the ESG do not stipulate details as to whether full or summarised reports are required (EQAR 2010, p. 46), ENQA and EQAR concur that making full reports public remains an important challenge (ENQA 2012a, p. 5). The situation is even more dramatic, as we look at QAAs in general, not only those listed on EQAR. Various experts consulted informally on the occasion of this Study indicated that, full reports, as written by the review panels, are still only published by a minority of agencies. In many cases, neither the decisions nor summaries of the reports are published.

### **Transparency and understandability of reports is unsatisfactory**

However, the information published is often not easy to access or understand, especially to users from other HE systems, due to its dispersion and the language(s) in which it is offered, but also because the reports vary significantly in terms of forms, structures, quality or depth (Vercruysse, Proteasa 2012, p. 18). For the users who are not content with a „yes” or „no” answer, QAAs’ reports can provide comprehensive information about strengths and weaknesses, and thus a holistic view on the quality of an institution/study programme. However, in order to serve as a meaningful transparency tool for students and other users across EHEA, including non-academic beneficiaries, those reports need not only to be easily accessible but also easily comparable and adequate in size and language (Vercruysse, Proteasa 2012, p. 18). However, there is until today no central register, nor a central format for QA results and the available information does therefore not yet allow for an easy, EHEA-comparable overview of recognised institutions/programmes.

The problem is particularly consequential, since difficult access to QAAs reports not only limits QA’s role as a transparency tool for external stakeholders, but may also reduce the effect transparency could have on stimulating quality development through higher internal accountability within HEIs.

ENQA has declared that in 2012 and 2013 the transparency function of external QA will be one of its focus areas. Amongst others, ENQA will analyse the publication practices of agencies in the EHEA and explore common standards for the format and content of the reports of the various QA procedures. In doing so, ENQA can strengthen the transparency function of QA and, at the same time, emphasise the specific purpose of QA compared to other transparency tools (ENQA 2012a, p. 6) which tend to be more simplistic in their message to society.

### **There are several examples of already existing national registers for recognised HEIs and programmes run by QAAs**

Bearing in mind the above mentioned challenges regarding transparency of EQA results, it is worth mentioning the several examples of already existing national registers for recognised HE:

- In Flanders, the Higher Education Register, which is bilingual and to which NVAO provides all the QA information, gives access to full EQA reports<sup>17</sup>;
- In The Netherlands, there is a study choice register, published by a foundation founded by the institutions and students unions and funded by the ministry, which brings information together from all official sources, including NVAO<sup>18</sup>;
- In France, CTI publishes information on all the assessed programmes (and only these can award the professional title) including a summary of their EQA evaluation<sup>19</sup>;

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<sup>17</sup> [www.hogeronderwijsregister.be](http://www.hogeronderwijsregister.be) or [www.highereducation.be](http://www.highereducation.be), checked on 24/05/2013

<sup>18</sup> <http://www.studiekeuze123.nl/>, checked on 24/05/2013

- In Poland, PKA publishes full panel reports from programme and institutional accreditations (in Polish language)<sup>20</sup>, as well as offers a database in English containing information on the assessed HEIs and programmes (including those which received negative assessment)<sup>21</sup>;
- In Spain, ANECA publishes information on all the assessed programmes including a summary of their evaluation (unless the evaluation was done by a regional agency which doesn't publish anything)<sup>22</sup>

The above examples prove that it is feasible to establish and run national registers for recognised HE. Linking the national databases into one EHEA-wide register should be the next, also feasible, step having a significant impact on the European QA dimension.

From the Study's research team's point of view, usefulness of such, national and European, registers is indisputable. First of all, they serve as a transparency tool for students and other users across EHEA, including non-academic beneficiaries, by providing easily accessible and comparable information on recognised HEIs and programmes. Secondly, they facilitate recognition. There are many national authorities, who do not know which degrees are awarded in their HE system. If they are approached by another authority, they cannot answer or they take a lot of time to answer this question. Most credential evaluators are reluctant to directly contact institutions, since they are not considered the authoritative source. And even when they do, it takes resources from the institutions, which they don't necessarily have (most of this information is still decentralised). Registers can thus facilitate recognition of European degrees within Europe and beyond, by making HE more transparent and reducing the burden and time needed to verify information. Finally, registers serve as whitelists. There is a growing concern not only about degree/diploma mills, but also accreditation and credential evaluation mills. A small group of people worldwide can keep track of these types of unrecognised and fraudulent activities. But blacklisting does not help. The diploma/accreditation mills often disappear only to pop up again with changed names. The only real solution to tackle this problem is whitelisting, a way to make it blatantly obvious which institutions, programmes and degrees are considered recognised by the competent authorities of the HE system. Registers will provide future students with the right information about recognised and quality assured HE and thus prevent them from ending up at unrecognised (and even fraudulent) providers by accident. A pan-European register could thus perfectly fit in EQAR's mission statement, since one of its agreed objectives is to „*reduce opportunities for "accreditation mills" to gain credibility in Europe, thus further enhancing the confidence of students, institutions, the labour market and society more generally in the quality of higher education provision in Europe*"<sup>23</sup>.

### **The majority of QAAs themselves are evaluated on a regular basis but IQA of agencies most often remains informal**

The ESG have introduced the requirement that QAAs themselves be evaluated on a regular basis. At least those agencies which are members in ENQA or EQAR, as well as the German-speaking agencies working within the system of the German Accreditation Council are evaluated regularly. In addition, most QAAs are reviewed within the remit of national oversight. These reviews take various forms such as Court of Audit, parliamentary oversight, control by an inspectorate. However, often these reviews do not focus on agencies' IQA.

Many agencies have begun to develop formalised and structured IQA systems (ESG 3.8). In most cases, however, IQA of QAAs is still organised on an informal basis (EQAR 2010, p. 47). ENQA used to have an Internal QA Group, which was abolished in 2012. This could be interpreted as a sign that agencies' IQA is also not an important issue for QAAs.

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<sup>19</sup> <http://extranet.cti-commission.fr/recherche/rechercheFormation>, checked on 24/05/2013

<sup>20</sup> <http://www.pka.edu.pl/index.php?page=raporty>, checked on 24/05/2013

<sup>21</sup> [http://www.pka.edu.pl/index.php?page=s\\_ocenione\\_en](http://www.pka.edu.pl/index.php?page=s_ocenione_en), checked on 24/05/2013

<sup>22</sup> <http://srv.aneca.es/ListadoTitulos/>, checked on 24/05/2013

<sup>23</sup> <http://www.eqar.eu/about/mission-statement.html>, checked on 24/05/2013

### **Independence of agencies is a difficult criterion in practice**

While most agencies could prove that they are independent from other bodies (ministries, rectors' conferences, students' unions, etc.) in their operation and decision-making, this independence is in some cases ambiguous (EQAR 2010, p. 46). Indeed, the ESG-criterion „independence“ is rather difficult in practice. This may in part be because the Standard is not easily interpreted within some of the contexts in which agencies work: no agency can ever be in a position of complete legal or financial autonomy. Reaching conclusions and making recommendations without any consideration of third parties, such as ministries and other stakeholders, may indeed be impossible, especially if these bodies initially define the framework and often the detailed standards according to which conclusions are reached. In those cases in which the agency is confined to making „recommendations“ to a ministry or other body taking the final decision, it is difficult to imagine that the knowledge of the working of the final body does not influence the work of an agency (Crozier et al. 2011). In these cases, the degree of independence further depends on whether QAAs have to defer the final decision to the minister/ministry which, however, cannot change the outcome or whether the minister/ministry taking the final decision has the power to overrule the recommendation of the QAA.

### **3.3.4 Stakeholder participation in EQA**

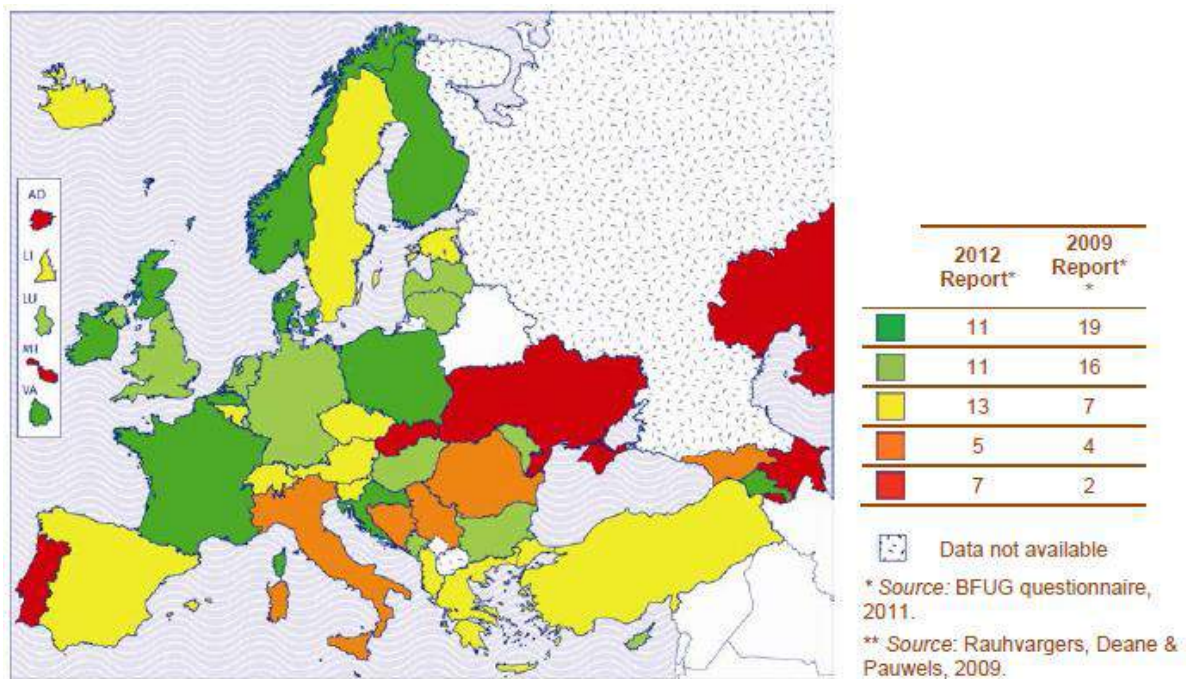
#### **Stakeholder participation in QA is one of the key elements of the „European approach“ to QA**

Stakeholder participation in QA is seen by many inside and outside Europe as one of the key elements of the „European approach“ to QA (SH-Interview). Indeed, most observers concur that the ESG and the EQAR have had a positive impact ensuring the participation of international reviewers and students in particular, with other stakeholders such as employers or the professional field being less visible (Westerheijden et al. 2010b, p. 37), but still present. The involvement of the academic community as key stakeholders has of course been a core feature of any QA system based on peer-reviews and there are no QA systems which do not include a decisive role for academic peers.

#### **Student involvement has increased**

Most observers concur that the ESG and the EQAR have had a positive impact ensuring the participation of students: *„One of the striking characteristics of the development of QA systems in Europe during the last decade has been the recognition of the importance of stakeholder participation, and in particular the importance of students as the key stakeholder group in HE. The Bologna documentation recognises that students should be fully engaged in the improvement and enhancement of HE and of their own learning experiences. The form of this engagement should be wide-ranging, involving students in all aspects of QA systems.“* (EACEA 2012, p. 66). *„In general, students contribute consistently to the reviews and most experts mention different examples of added value“*, by providing new solutions, enriching evaluation reports, and expanding and including other aspects not previously taken into account, or which have not been addressed likewise (Galan Palomares 2012). The growth of student involvement in QA has been a consistent finding in BFUG reports until 2012, when the methodology of data collection changed.

The current assessment by the BFUG of student involvement in QA areas such as the governance of national agencies for QA, as full members in external review teams, as observers in external review teams, in preparation of self-assessment reports, as part of the decision making process for external reviews and in follow-up procedures is shown by the following map:



### Scorecard categories

- In all quality assurance reviews, students participate at five levels:
  - in governance structures of national quality assurance agencies
  - as full members or observers in external review teams
  - in the preparation of self evaluation reports
  - in the decision making process for external reviews
  - in follow-up procedures
- Students participate at four of the five levels mentioned above
- Students participate at three of the five levels mentioned above
- Students participate at two of the five levels mentioned above
- Students cannot participate or participate at only one level mentioned above

Figure 4: Level of student involvement in QA, 2010/2011. Source: EACEA, 2012, p.66

The 2012 BFUG results show that there is still considerable room for progress. Only 11 HE systems currently demonstrate that students systematically participate in all areas of internal and external QA systems, although a sizeable number (11) indicate that students are involved in all but one of these areas. Among these countries, students are most commonly not involved in follow-up procedures (EACEA, 2012, p.66). The ESU report „Bologna with Student Eyes” (Päll 2012, p. 122), confirms this picture.

To facilitate competent student involvement in QA, in 30 countries interviewed by ESU, there are now 18 student experts pools of which 6 are run by student unions (Gavra 2012, p. 17). These pools train students in QA and their role in EQA and are used by QAAs to find student reviewers for their QA procedures.

### **Student participation in EQA is higher than in IQA**

In general, it can be observed that the level of student participation in EQA is higher than in IQA: According to the student unions' perception, in almost half of the countries students are highly involved in most of the HEIs, though not in all of them students are considered as full partners. However, in 3 countries (Azerbaijan, Slovakia and Ukraine) the national students' unions claim that students are not being involved and in another 5 countries the involvement of students on the institutional level is very limited (Päll 2012, p. 120). In summary, in some countries the presence of students does not always mean equality with respect to other participants: „*The role of the students is formal presence with no real influence over decisions*” (Westerheijden et al. 2010b, p. 31). However, the trend towards more involvement is clear (SH-Interview).

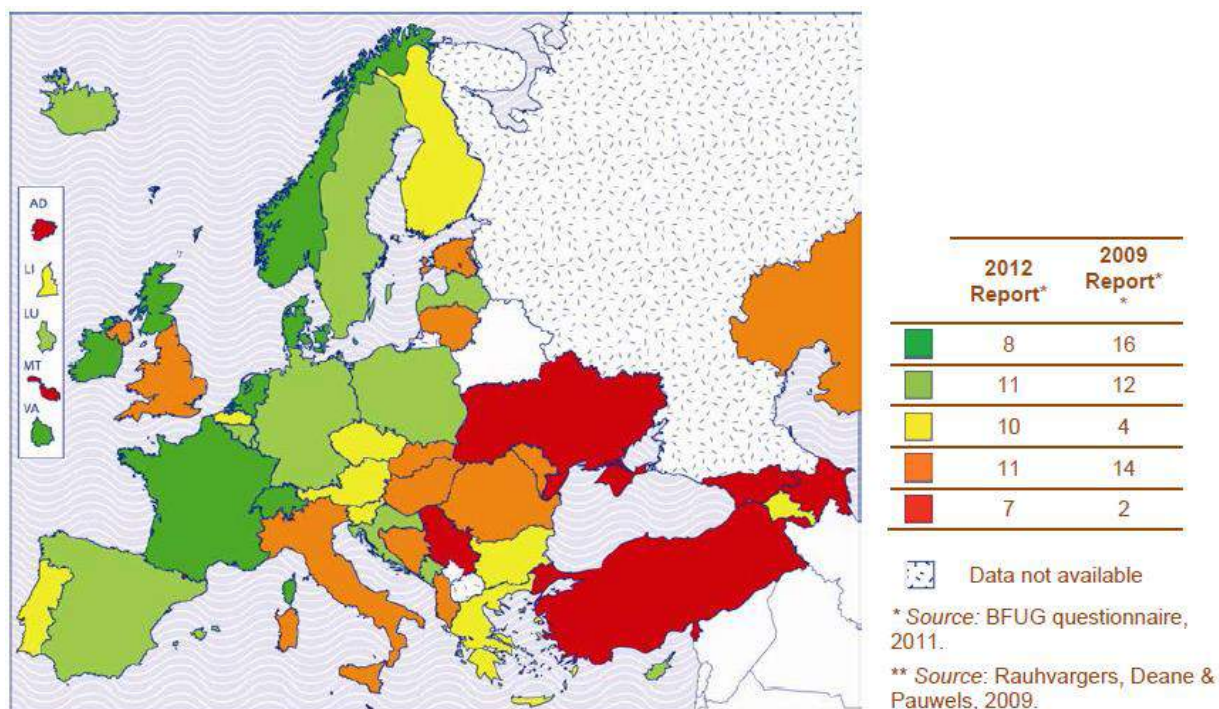
### **The involvement of the professional sphere is gaining importance, but difficulties to implementation persist**

The findings of the 2012 BFUG report „*indicate that employer involvement has become a feature of QA in many systems. Indeed 28 countries state that there is a formal requirement for involvement of employers – whether in governance bodies or in external review teams. Among the 14 countries that state that there is no such formal requirement, it should not be assumed that there is no employer involvement. For example, the United Kingdom points out that the involvement of employers depends upon the orientation provided by HEI being evaluated. Thus in this case, the principle of institutional autonomy is respected above formal requirements for employer involvement*” (EACEA 2012, p. 67). However, these findings have to be taken with a grain of salt as all stakeholder organisations concur that employer involvement is still rather weak overall, with HEIs having particular difficulties involving them in processes of IQA.



## International involvement has increased considerably

In 2007 there was virtually no international participation in external reviews of QAAs and barriers were seen in language and legislative restrictions (Bologna Follow-up Group Stocktaking Working Group 2005-2007 2007, p. 26). In 2009 still less than half of the countries had international participation in the governance of QAAs but several countries stated that they invited international participants to governance meetings of the QAAs (Rauhvargers et al. 2009, p. 64). The 2009 BFUG report thus clearly stated that more international involvement in QA was needed. In 2012, the level of international participation in QA is highly uneven across the EHEA (EACEA 2012, p. 10). International peers are most frequently mentioned as members participating in external review teams (in 66% of EHEA countries, n=31).



## Scorecard categories

- In all cases the following four aspects are met:
  - agencies are full members of ENQA and/or listed on EQAR
  - international peers/expert participate in governance of national QA bodies
  - international peers/experts participate as members/observers in evaluation teams
  - international peers/experts participate in follow-up procedures
- Three of the four aspects are met
- Two of the four aspects are met
- One of the four aspects is met
- No international participation

Figure 5: Level of international involvement in QA, 2010/2011. Source: EACEA, 2012, p.68

The fact that the results of the 2011 BFUG survey show that the participation of international experts is less frequent than assumed, based on the 2009 results, is a result of a different approach to data collection used for the purpose of the 2012 report.

### 3.3.5 Recommendations regarding EQA in the EHEA

Based on the findings on EQA in the EHEA, **the Study's research team** agrees on the following recommendations. They will be presented according to the rationales of transparency, consistency, and credibility of external QA.

#### 3.3.5.1 Recommendations on Transparency

##### **All assessment reports should be published and easily accessible**

All EQA reports are published and when (not if) they are published, they should be available through a search engine on the home page of every QA agency's website. This means they should be neither hidden away and impossible to find nor only available through application of the freedom of information law. This should be ensured by EQAR for those QAAs listed on the Register, but also by Member States with reference to their national agencies.

##### **Assessment reports should be understandable and use a commonly agreed QA terminology for the whole EHEA**

All EQA reports are written with an intention to be meaningful and understandable for all stakeholders. This means all reports should include an executive summary which is clear and straightforward. In addition, applied standards and criteria should be reproduced throughout each report to make these reports more user-friendly. In particular, ENQA common standards for the format and content of the reports should be developed and implemented. While the ESG are widely used across different contexts neither format nor terminology of QA are unified. This may be one of the reasons that the ESG have so far avoided to explicitly define „QA agencies" or „external QA processes" (ENQA 2011, p. 18). ENQA shares this analysis when stating that *„the document could be improved by some further work to increase clarity of terminology and to ensure the removal of ambiguity both in terms of the language used and also with regard to the standards and guidelines themselves to ensure that they are as clear as possible"* (ENQA 2011, p. 23). The common standards could become part of the revised ESG and should ensure more comparable QA practices without enforcing uniform solutions or hinder diversity of QA procedures.

##### **Assessment reports should include the full names of panel members and their short CVs**

Each QAA should publish the names, titles and short description (max. 300 characters) of the panel members in the assessment reports. The executive summaries should reproduce at least the names and titles. The short description explicitly includes the type of expertise (subject-specific, educational expertise, etc.) this person brought to this procedure. The short CVs (max. 1500 characters) of these panel members should be included as an annex to the assessment report. It is self-evident that all panel members should be trained (or have otherwise credible experience). The form and dates of their trainings should be included.

##### **National registers of recognised HE**

All HE systems in Europe should establish registers of recognised HE. Each register includes both programme and institutional details as well as the most pertinent data regarding EQA of institutions and/or programmes. In particular, and for recognition purposes, the qualification awarded by each programme should be included in the register.

This is also important for the growing area of cross-border provision described in chapter 3.8.1. Validated and franchised degrees and branch campuses should also be included in the registers both of the receiving country as well as the exporting country. The national registers should provide the same key information and should be easy to navigate for users.

##### **European portal for HE**

A European portal should be established to gather the information included in the national registers mentioned above and provide a search engine to ensure pan-European accessibility of information. This portal should cater to all potential target audiences but be optimised for potential students and for

credential evaluators (and recognition bodies). For the latter, it is essential that an archive is kept per academic year. ECA's Crossroads (see chapter 3.6.2) is an initiative in this direction, but it will need to be better integrated in the European QA architecture to become truly useful to its potential users.

### **3.3.5.2 Recommendations on Consistency**

#### **Training of panel members**

Consistency between panels is a constant point of attention and one of the most difficult issues with peer reviews. All persons which take part as a panel member in QA procedures should therefore be trained regarding:

- the aim of external QA (preferably in international perspective);
- the way audit techniques can be used during interviews and site visit;
- the interpretation and evaluation of the criteria used in the review
- intercultural competences.

ECA has developed a shared Training Approach moving in this direction<sup>24</sup>.

#### **Expert pools**

All QAAs should keep track of the experts they have trained and who have taken part in QA procedures. QAAs keep portfolios of experts (expertise, QA experience, etc.) and evaluate expert's performance to make sure that well-performing experts can be easily identified.

#### **Sharing experts**

All QAAs should be able to share the experts they have trained and/or included in QA procedures. This should facilitate more non-national experts in QA procedures and increase the independence of panels. The information on experts should contain all information reported in the QA reports (s. above). ECA is in the process of developing a platform to share experts among agencies<sup>25</sup>.

#### **Intended LOs**

Both qualification frameworks and ECTS put emphasis on LOs. In a learning outcomes-based system, education is seen as an outcome-based process expressed in the LOs (to be) achieved by the learner.

A number of QAAs have started to introduce intended LOs into their assessment frameworks at programme level. All HEIs however need to relate the intended LOs to the corresponding cycle in the Framework for Qualifications of the EHEA or level in the European Qualifications Framework. The intended LOs should also meet the requirements of the subject or discipline and the professional field. QAAs should be explicitly obliged to assess whether the intended LOs are adequate for their corresponding QF EHEA level as well as adequate regarding the state of the art of the discipline, keeping in mind the relevant labour market(s) and/or professional field(s). A reference to QFs and LOs should be included in the revision of the ESG.

#### **Achieved LOs**

QA systems should be able to assess both intended (what do they aim to do?) and achieved (what have they done?) LOs. A fitness-for-purpose-oriented QA system must ascertain itself that the institution does what it aims to do. QA should therefore ensure that the teaching and learning environment is suited to achieve the intended LOs and that the programme's intended LOs are actually achieved by the students. Achievement should be demonstrated by the programme through its student assessments, and only verified by the assessment panel. Assessment panels can look at a combination of work done by students (seminars, projects, theses, etc.) which according to the programme demonstrates

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<sup>24</sup> <http://www.eaconsortium.net/ecapedia/Portal:Trainings>

<sup>25</sup> <http://www.expertsplatform.eu> (last visited on April 27)



achievement. National QA systems should include this component in their quality assessment at programme levels, as is practiced already in a number of countries (e.g. the Netherlands, Ireland, Sweden), although they need to be careful that the consequences resulting from such an assessment must be proportionate to the validity of the assessment procedure.

### **Fitness-of-purpose**

With the increasing professionalization of the QA community in Europe and the development of common QA procedures there is a growing danger of losing sight of the fundamental purpose of QA, namely to assess quality and thus contribute to the enhancement of quality (SH-Interview). The growing number of national requirements and legal issues are adding purposes, while the development of routines leads to QA professionals to question them more seldom. However, regular reflection on the fitness-of-purpose of procedures is a crucial consideration, because a growing outcome-orientation in quality assurance requires that QA instruments must be able to correctly assess the right outcomes. The revision of the ESG should continue to allow for a diversity of purposes.

Since QA legislation and QAA procedures define the framework for EQA, and different types of EQA approaches may be adequate for different degrees of maturity of IQA systems, it seems reasonable that national QA systems allow for different degrees of HEI autonomy correspond to the maturity of institutional IQA processes. An example may be the „risk-based approach“ currently being introduced in England.

### **3.3.5.3 Recommendations on Credibility**

#### **Assessment of quality should be more clearly separated from that of national requirements**

Many assessment frameworks include standards that relate to requirements which are part of the legal framework or enforced by other authorities. These national requirements are often not about quality itself and regularly contradict other national requirements<sup>26</sup>, thus hindering cross-border cooperation. Especially joint programmes are regularly confronted with these national requirements since they need QA and/or accreditation in several HE systems. Therefore, national QA systems should provide for a clearer distinction between assessing compliance with the legal framework and assessing the quality of programmes. For joint-programmes, a pan-European QA approach should be developed in which the nation-specific structural criteria should not need to be applied (see also chapter 3.8.1).

#### **Experts need to be authoritative and independent**

The members of assessment panels should be seen as experts in their field and this should be demonstrated in the assessment reports by including their CVs in an annex. In addition, all members of assessment panels need to be demonstrably independent. Independence here means that these experts have no interest in either a positive or a negative outcome of the QA procedure. All panel members should be required to sign a statement of independence which outlines how a QA agency interprets independence. These signed statements should be included as an annex to the assessment report.

#### **Recognition should be based on quality and LOs**

Current recognition practices are slowly but steadily moving towards decisions based on LOs and quality (or results of QA procedures)<sup>27</sup>. If European recognition bodies and credential evaluators at institutions don't overwhelmingly trust the results of QA procedures, why would other stakeholders do so? Those who are not familiar with QA shouldn't need to understand the details of all QA systems. Three measures seem essential: the network of recognition bodies (ENIC-NARICs) should be included more coherently in policy-making at the European level, recognition at the levels of ENIC-NARIC, the

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<sup>26</sup> One noteworthy example being the German KMK-„Strukturvorgaben“

<sup>27</sup> The EAR Manual, now endorsed by the ministers and part of the Bologna Process reflects this shift: <http://www.eurorecognition.eu/emanual/Chapter%203/default.aspx> (last visited on April 27)

professional field and HEIs needs to be more strongly linked to QFs and QA, and the ESG need to be updated to provide a link of trust between institutions by including adequate references to QFs and LOs.

### **Mutual recognition of QA results**

A well-functioning QA area should be identifiable by the trust HE stakeholders have in QA procedures and their results. The ESG are the only instrument, upon which trust can be built within the EHEA. Yet, at the same time, the ESG is based on the quality of QA procedures and of QAAs, and not on the quality of education, in which trust should be established. Therefore, in order to create a basis for trust in another QA agency's decision, the ESG should be updated to include references to QFs and LOs.

## **3.4 WHAT WERE THE DEVELOPMENTS REGARDING THE EUROPEAN QUALITY ASSURANCE REGISTER (EQAR)?**

This chapter focuses on the state of developments regarding EQAR, the first legally established organisation that has directly emerged from the Bologna Process as an independent and permanent organisation (Tück 2012a, p. 7). The analysis of the existing legal practices in EHEA countries recognising EQAR-registered agencies and regarding how HEIs make use of the existing possibilities to request reviews by foreign agencies listed on the Register, is a subject of the next chapter.

In 2011, reflecting the decision of the London ministerial summit in May 2007, EQAR was externally evaluated by an independent Expert Panel. Since the review was undertaken after only 2 years of EQAR's establishment, the volume of evidence to evaluate its operation was limited (David, et al. 2011b, p. 2). Nevertheless, the report, along with EQAR's annual self-evaluation reports from the years 2009-2012, provides a comprehensive source of information for this study. In particular, the questions the Expert Panel was invited to address, became research questions of this progress report, as they grasp the most relevant issues to be explored with reference to the Register.

### **EQAR has established a reputation as a credible, valuable organisation.**

EQAR was founded in 2008, by the E4 Group, to maintain a Register of QAAs that have proven to comply substantially with the ESG and to promote transparency, trust and international recognition in QA of HE (Tück 2013, p. 18). Since the last EU progress report, the developments of EQAR have gained momentum. The Expert Panel concluded that in the first two years of its existence, much has undoubtedly been achieved by EQAR, despite the small size of its Secretariat and its relatively modest funding, and it has established a reputation as a credible and valuable organisation (David, et al. 2011b, p. 13). Furthermore, it emphasized that there was evidence of confidence and trust in the integrity and independence of the Register Committee and of its procedures (David, et al. 2011b, p. 13). EQAR is confident that it has established itself as the authoritative information source about reliable QAAs in Europe (Tück 2012a, p. 37). To what degree compliance with the ESG means that an agency is reliable will be one of the subjects of this chapter.

### **However, progress is not happening as quickly as expected**

Consultations with stakeholders revealed a strong perception that progress regarding EQAR is not happening as quickly as some expected, especially in terms of its impact on opening national HE systems to registered agencies (SH-Interview).

### **While governments claim to support EQAR, more legislative action is required to strengthen European cooperation in EQA**

The 2012 Ministerial Communiqué marked an important step towards strengthening EQAR's position, by encouraging QAAs to apply for registration and affirming that the Ministers will allow EQAR-registered agencies to perform their activities across the EHEA, while complying with national requirements by 2015 (Bucharest Communiqué, April 2012).

Notwithstanding the remarkable progress made in the first 4 years of its establishment, EQAR has not yet reached its full, EHEA wide potential. Despite a strong commitment made by EHEA Ministers in Bucharest, yet not all countries are Governmental Members (SH-Interview). For EQAR to reach its potential, as well as for the common European QA dimension to work, all countries should have their members in its structures (SH-Interview). Stakeholders agree that for EQAR to reach its full potential,

more agencies on the Register and an open QA „market“ (see chapter 3.5) are required (SH-Interview). In their (and the Study’s research team’s) perception, without a strong European cooperation in EQA, with the Register as its main pillar, the common QA dimension is not complete. A coherent QA framework for EHEA should be a framework in which HEIs are free to choose any EQAR-registered agency for their EQA reviews and in which qualifications are thus universally recognised (Tück 2013, p. 17).

### **3.4.1 What have been the activities of EQAR? What progress has been made regarding quantitative growth (Number of registered agencies, number of applications, etc.)?**

**Out of 60 to 70 QAAs operating in Europe, about 46 agencies have undergone an external review against the ESG and are thus in position to apply for inclusion on the Register. 39 agencies applied for inclusion in EQAR and 32 were approved. 28 agencies based in 13 European countries are currently featured on the Register**

According to EQAR’s knowledge, out of 60 to 70 QAAs operating in Europe, about 46 agencies have already undergone an external review of their activities against the ESG and thus are in position to apply for inclusion on the Register (Tück 2012a, p. 31; Tück 2013, p. 2). The number compared with 30 QAAs which had their compliance with Standards and Guidelines externally reviewed in 2009, is a sign of progress (EQAR 2010, p. 7) widening the circle of potential QAAs to be on EQAR. By the end of 2012, 39 agencies, representing 85% of those eligible, have applied for inclusion on EQAR (Tück 2013, p. 2) and 32 (82%) applications were approved. Out of the remaining 7 applications, the Register Committee rejected 3 and 4 were withdrawn by the QAAs to avoid possible rejection (Tück 2013, p. 3). According to EQAR, the high level of acceptance reflects the overall high quality of applications received. By the end of 2012, after 9 application rounds, a total of 28 agencies based in 13 European countries were featured on the Register (Tück 2013, p. 2). Since December 2009, the number has increased by 11, showing a gradual growth of the Register (EQAR 2010, p. 9)<sup>28</sup>.

#### **Non-European agencies express interest in applying for registration, and thus entering the European QA „market“, however their alignment with ESG may be challenging**

Although the Register is open to all QAAs that commit to the ESG, regardless whether they are organised at national or European level, or based outside Europe (EQAR 2010, pp. 48–49), almost all of the registered agencies are from EU Member States. Thus far, there are only 3 agencies from countries outside the European Union listed in EQAR: 2 from Switzerland and 1 from Croatia (acceding state to the EU). There has been only one, unsuccessful, application from a non-European QAA (Tück 2012a, pp. 34–35). EQAR consultations show that several non-European agencies have expressed great interest in preparing for an application at a later stage in order to:

- a) improve opportunities of working with European HEIs by achieving a better recognition of their activities in Europe, at either formal or reputational level and/or
- b) Improve the recognition of HEIs and/or programmes from agency’s home country in the EHEA, using their QA activities and EQAR as a proxy (Tück 2012a, pp. 34–35).

Nevertheless, their alignment with the ESG and consequently inclusion on EQAR can be a great challenge, since certain principles may be less common or more difficult to incorporate in other parts of

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<sup>28</sup> The difference between the number of agencies admitted to the Register since 2008, and the current number of registered agencies is a reflection of the fact that agencies are admitted to the Register for a period of five years, counted from the date of the external review report. Whereas 4 of these reviews were conducted in 2006 or 2007, registration expired and has yet not been renewed (Tück 2013, p. 2). One of those former EQAR-registered agencies is currently undergoing its next external review, which might indicate it will seek renewal for registration. 3 others have ceased operations and/or merged with other QAAs, of which 2 plan to undergo a review against ESG within the two years to come and may decide to apply for inclusion on EQAR on that basis.

the world, especially in countries with significantly different organisational and legislative contexts (Tück 2012a, pp. 34–35). Student participation figures high among these difficulties.

It is therefore clear, that EQAR is a European body (SH-Interview), both because of its membership as well as because of the European QA philosophy it serves.

#### **Among EHEA agencies that have not yet applied for registration, only 50% plan to do so**

Based on an EQAR survey conducted among QAAs that have not yet applied for inclusion on the Register, half of the respondents confirmed they plan to do so and 15% stated they do not, with the rest remaining „not sure yet” (Tück 2012a, p. 34). QAA (UK) and UK-ambetet (Sweden) are among agencies that have chosen not to apply for membership.

#### **Agencies apply for registration primarily to improve their reputation**

In line with the European framework, being registered on EQAR is voluntary. There is no formal obligation for any QAA to apply for registration, unless by national legislation (Tück 2012a, p. 6). For example in Romania and Denmark the national QAAs are obliged by law to seek registration on EQAR. The 2012 Bucharest Communiqué, in which the Ministers committed to encouraging QAAs to apply for registration on EQAR, can serve as a driver of such legislation.

So far, the primary reasons to be listed on EQAR as indicated by QAAs are (Tück 2012a, p. 35):

- a) to improve international reputation, i.e. to gain a better standing in relation with international partners through demonstrating (publicly) that the QAA has proven its substantial compliance with the ESG in a robust and reliable process;
- b) to improve national reputation, to fulfil the expectations of governments or stakeholders, and to facilitate the recognition of institutions or programmes reviewed by the agency;
- c) to improve (international) recognition of institutions and programmes/qualifications that have been audited, evaluated or accredited by the agency.

Another reason stated in informal communications is that once an agency has an ENQA-review, the step to EQAR-registration is not costly. Also, some national authorities may encourage their QAAs to register, even if it is not mandatory in the law. Governments may see their agency’s membership as a way to link their HE system stronger to the Bologna Process, as well as a way to benchmark themselves internationally (SH-Interview), although this is doubted by some members of the QA community.

From the above mentioned answers, as well as stakeholder interviews, it becomes evident that increased reputation and visibility has been the main motivation to be registered on EQAR, much more than to have access to a common „market” of QA (as was originally intended by the ministers responsible for HE). As indicated by the stakeholders during interviews, QAAs apply for EQAR because they want to „be in the club” (SH-Interview).

#### **Access to a common QA „market” is rated as a less important reason for inclusion. Only 43% of the registered agencies operate across borders**

High international visibility of EQAR beyond the EHEA makes the register attractive even for agencies which have no intention of operating across borders or are outright barred from doing so by national legislation. This is a curious development, since membership in ENQA, being also based on the ESG as admission criteria, could in theory be expected to have the same effect on a QAA’s reputation.

Generally, access to the European „market” of QA does not seem to be a strong motivation for joining EQAR and many agencies are not interested in operating in other countries (SH-Interview). As of the end of 2012, out of 28 registered agencies only 12 (43%) were operating in other, multiple countries across EHEA (Tück 2013, p. 3) (For a description of the pattern of cross-border agency activity see chapter 3.5.2). On the other hand, since EQAR-registered agencies have so far been allowed to work with HEIs only in 9 European countries (see chapter 3.5.1), and usually under several conditions, opportunities for QAAs to operate in other countries are still limited. Moreover, agencies that want to be internationally active come across several other challenges.

**QAAs may be reluctant to apply because right now the benefit of being registered is not immediately clear with EQAR having limited impact on creating a common market for QAAs and functioning mainly as a platform for European QA outside of Europe**

QAAs may be reluctant to join EQAR because the benefit of being registered is not immediately clear for the agencies, even for those already enlisted. While the supposed benefit is for QAAs to operate in other European countries, as pointed out before this has not been regarded by agencies as a main motivation to apply, especially since the majority of European countries have not (yet) opened their systems for EQAR QAAs. While unintended, the current de-facto function of EQAR may therefore be less one of creating a „common market for QA agencies”, but rather one of creating a platform for European QA outside of Europe. For agencies this may not be a sufficient value-added.

**Main challenges of being internationally active are related to national differences and lack of a common European QA framework**

The following challenges of being an internationally active QAA have been identified by EQAR registered agencies in a survey conducted jointly by CHE-Consult and EQAR for the purpose of this study:

**1. Balancing investment (in time and money) and benefits for partner organisations and own organisation is a challenge**

All international activities have to be self-funded, and due to the volatility of this sector for some agencies it is difficult to invest in this area and/or to keep permanent staff managing international procedures. Also, national budgets often do not allow for the more expensive international reviews. Also, many governments do not see a positive relation of costs to benefits when it comes to international QA of its HEIs.

**2. Cultural, linguistic, legislative and methodological differences make international activities challenging**

The main challenge named by the vast majority of agencies is the necessity to gain insight into the specific local context and perspectives and the foreign system of HE in a very short time. Cultural differences and differences in methodology of EQA can make the process more difficult to implement. Often the language and terminology of QA and the HE sector is different and even translated documents are often more difficult to interpret. Assuring the same level of quality in performing assessment procedures abroad, with no collision with the values applied in national procedures of the agency is a challenge.

Managing the EQA process with self evaluation reports, external visit, external reports, etc. is complicated by the same reasons. Also, follow-up procedures in international reviews are more difficult to implement or control.

**3. The lack of a common legal framework allowing registered QAAs to operate internationally is another limiting factor**

Many agencies mention the difficulty of fulfilling the legal requirements of the host country. This is especially difficult with the international recognition of units/diplomas/degrees which need to be compatible with two legislations such as in the accreditation of joint programmes and the recognition of joint/multiple degrees.

The limited impact of being on EQAR is also mentioned as a barrier, which, if changed, would greatly increase international activities of QAAs. A common legal framework allowing EQAR-registered QAAs to operate internationally and to recognise their decisions as trustworthy by national governments would increase the impact of EQAR.

**30 EHEA countries joined EQAR's structures as Governmental Members, only 13 have their national QAAs on the Register**

Last but not least, reporting on EQAR's organisational development, the number of governmental members must be addressed. When EQAR was founded, 19 governments joined its structures as Governmental Members, exceeding expectations of the E4 Group (Tück 2012a, p. 13). Now, with 31 Governmental Members (from 30 countries), more than half of the EHEA countries are represented in

EQAR's structures, which demonstrates progress, however still leaves considerable room for improvement. Interestingly, only 13 (a little over one third of) countries governing EQAR have their national QAAs on the Register (Belgium, Bulgaria, Switzerland, Germany, Denmark, Spain, Finland, France, Croatia, Lithuania, Netherlands, Poland, Romania). A wider governmental membership and agencies base is also crucial for EQAR to be financially self-sufficient (SH-Interview).

### **3.4.2 Are the organisational structures and methods of EQAR fit for purpose in the light of the agreed objectives? Have they functioned effectively and efficiently in practice?**

#### **3.4.2.1 Organisational structure**

##### **Stakeholders and governments consider EQAR's organisational structure as fit-for-purpose**

The founding of EQAR in 2008 concluded a long phase of conceptual and preparatory work by the E4 Group (Tück 2013, p. 18). The key challenge was to develop an organisational structure that reflects co-governance of EQAR by governments and stakeholders, and at the same time defines the Register Committee as an independent expert body (Tück 2012a). The question whether the existing structure is fit for purpose, effective and efficient in practice has been elaborated by the Expert Panel that reviewed EQAR in 2011. By and large, stakeholders and governments consider EQAR's organisational structure, with the governments as owners and the steering done by stakeholder organisations, as fit-for-purpose (Tück 2012a, p. 16; David, et al. 2011b, p. 3; SH-Interviews). Although at first sight, this structure may appear complex, it is rooted in EQAR's function and responsibility, as well as the context in which it operates and the need for differentiated roles for both governments and stakeholders. No respondents surveyed by EQAR suggested a simpler or lighter alternative to the existing structure (Tück 2012a, pp. 11–12).

##### **EQAR's structures have worked effectively and efficiently**

The Expert Panel assessed that EQAR's structures have worked effectively and efficiently, in spite of experiencing a number of typical challenges of new organisations, such as internal communication between its bodies (David, et al. 2011b, p. 14). Several EQAR interviewees underlined that it was not bureaucratic and operated efficiently and responsively (Tück 2012a, pp. 11–12).

##### **Many Governmental Members lack sense of EQAR's ownership and willingness to promote the Register and its use at national level**

Major weakness of the current structure is that governments are not fully satisfied with the existing possibilities to engage themselves within that structure and sometimes lack a strong sense of ownership. Being a Governmental Member of EQAR is not regarded as an opportunity to contribute actively to the building of the EHEA. Moreover, with a few notable exceptions, many members do not seem to consider promoting the Register and its use to their constituencies, as part of their responsibility to support EQAR's mission (Tück 2012a, p. 13). Also see chapter 3.5.1.

#### **3.4.2.2 Methods and procedures**

##### **Generally agencies find the EQAR registration process transparent and have no major concerns regarding consistency and fairness of Register Committee's decisions**

The data presented by EQAR, based on a questionnaire to QAAs and the feedback on the Guide for Applicants, suggest that agencies find the EQAR application process largely transparent, clear and efficient (Tück 2012a, p. 25). Furthermore, the external stakeholder feedback does not show major concerns as regards to Register Committee's decisions being consistent, fair and proportionate (Tück 2012a, p. 30). The External Panel generally concurred with those findings. Nevertheless, several concerns remain, for example that sometimes it takes a lot of time for EQAR to make its decisions (The IEP process took two years) (SH-Interview).

##### **Students feel EQAR should be able to conduct its own external evaluations of agencies**

Concerns refer also to Register's decisions being based on external review reports. In particular, a majority of national student unions, that know about EQAR (i.e. 14 out of 17), agrees that the role of the Register should be strengthened and it should be able to organise and conduct its own external evaluations of agencies applying for registration (Päll 2012, p. 131).

### **The ESG in their current format are not easy to apply as membership criteria**

The concept of „substantial compliance” with the ESG was agreed on by the E4 Group when preparing an operational model for EQAR. It underpins the understanding that the ESG are not a checklist, but a set of agreed principles and reference points for QA. The doubts raised by stakeholders are primarily related to this application of the ESG as criteria for admission to the Register. As pointed out by the Expert Panel, the ESG had been established as a development, enhancement and capacity building tool, rather than for registration purposes<sup>29</sup>. *„Research evidence and practical experience suggest that there is always a tension between criteria and processes designed with assurance, compliance and accountability objectives in mind, and those with enhancement and developmental objectives in mind”* (David, et al. 2011b, p. 3).

Indeed, there are different ways in which an agency can adhere to the various principles, and even if it is not complying with every standard to the letter of the law, it may be considered substantially compliant with the ESG as a whole. The judgement is not made in a mechanical process. The Register Committee does not apply any numerical rules, but a holistic view is sought on the application and the external review team's analysis of the applicant's compliance with the different ESG before reaching a comprehensive judgement (EQAR 2010, p. 44). In particular, due to the nature of the ESG, different external review teams may not (and cannot be expected to) be entirely consistent in their judgements. Therefore the Register Committee, trying to level out possible different interpretations of ESG compliance in order to ensure consistency in its own decision-making, might come to a different conclusion as to compliance with the ESG than the panel. This concept is often in contradiction with agencies expectations for a checklist-type judgements or numerical rules (Tück 2012a, p. 28). On the other hand, this expectation is somewhat surprising, since QAAs often apply the same principal of „substantial compliance” with criteria when conducting reviews themselves.

### **Different interpretations of „substantial ESG compliance” were often not transparent to QAAs**

A possible reason for the wish for some straight-forward criteria comes from a small number of cases of evaluations against the ESG resulting in different decisions regarding ENQA and EQAR-membership.

#### **1. The differences result from different approaches to compliance and lack of clear guidelines**

The differences in interpretation result from the fact that both ENQA and EQAR started out with a different approach towards compliance and have so far not established agreed guidelines of how they understand „substantial compliance” with the ESG. The ESG themselves and the notion of „substantial compliance” leave considerable room for interpretation and discretion of judgements.

#### **2. ENQA and EQAR each use and apply the ESG for their specific purposes and in the context of their unique mission and thus might come to different conclusions**

EQAR registration has the function of a „seal”, allowing agencies to demonstrate their legitimacy and credibility in terms of their compliance with the ESG. ENQA is a membership organisation of QAAs, representing their interests at European level, providing networking opportunities for agencies and allowing them to develop capacity. European ministers and stakeholders deliberately decided that the function of managing a register of agencies should be vested in a separate and independent organisation. Due to the difference between membership of ENQA, being rather

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<sup>29</sup> As a matter of fact, the term “compliance” is not alien to the ESG: *“This report recommends that any European agency should at no more than five-year intervals conduct or be submitted to a cyclical external review of its processes and activities. The results should be documented in a report which states the extent to which the agency is in compliance with the European standards for external QAAs (see Chapter 2, Part 3).”*

developmental, and registration on EQAR, being rather compliance-oriented, it is natural that EQAR and ENQA might come to different conclusions as to whether an agency complies substantially with the ESG. In practice, this, however, only happened in three cases, as stated above (Tück 2012a, pp. 26–27).

### **3. There is a strong need to clarify the decision processes of EQAR and ENQA**

Several agencies have pointed out that the relationship between both organisations' decision-making processes is not clear to them (Tück 2012a, pp. 26–27). The External Panel clearly emphasized the need to clarify the potential for the different interpretations to the public, as well as called for more transparent definition of the „awkward“ requirement to demonstrate „substantial compliance“ with the ESG. The available studies, as well as interviews with stakeholders (SH-Interview) clearly demonstrate a common need for this clarification.

A first step towards improving the situation has already been made with EQAR's decision to publish Register Committee's decisions, including the reasons for the decisions – see below.

#### **Since 2009 EQAR has implemented several changes to the methods used by the Register with a view to improve its processes and respond to stakeholder expectations**

In the reporting period, with a view to improve its processes and respond to stakeholders' expectations, as well as Expert Panel recommendations, EQAR implemented several changes to Register's methods.

##### **1. A Merger Policy has been adopted**

First of all, in 2012, EQAR adopted a „Merger Policy“ addressing the registration status of EQAR-registered QAAs after a merger, including the conditions, requirements and timeframes for merged agencies to remain on the Register. Accordingly, when all agencies involved in a merger have already been registered, they may remain on the Register for up to two years, during which the new, merged agency will have to undergo an external review against the ESG<sup>30</sup>.

##### **2. Procedures for Application have been revised to clarify eligibility requirements as opposed to the substantial criteria (ESG) as well as to enhance transparency of Register's decisions**

Secondly, in 2012 new, revised Procedures for Applications were adopted. The revision was based on the broad experience gathered by the Register since 2008 and took into consideration recommendations made by the Expert Panel. The main changes included: introduction of a clear two-step application procedure to confirm eligibility of a future application, before the external review process and actual application; stipulation that full Curricula Vitae of the external review panel members have to be submitted with applications and clarification of registration rules. Moreover, since December 2012 The Register Committee's decisions on all eligible applications for inclusion on the Register will be published, including the reasons for the decisions (Tück 2013, p. 6).

#### **3.4.3 What has been the initial impact of EQAR? Is it in line with the desired goals?**

##### **The evidence to judge EQAR's impact is limited**

EQAR's impact in terms of the objectives set out for the Register, as well as from the perspective of different stakeholders is not yet fully explored (mainly due to the limited volume of evidence) and therefore difficult to judge. Various analytical reports, including „the Bologna Process Independent Assessment“, „Transparency Tools Across the EHEA“ and „Trends 2010“ address this question only indirectly, partially and slightly. The findings of the Expert Panel are equally limited, mainly because the review was undertaken after only 2 years of EQAR's establishment, reducing opportunities to evaluate its operation, not to mention its impact (David, et al. 2011b, p. 2). Even EQAR gathers and provides only scarce information on this subject, claiming that its ability to systematically monitor, track and analyse its use and impact is currently limited, also due to insufficient resources (Tück 2012a, p. 34).

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<sup>30</sup> <http://www.eqar.eu/>, checked on 15/04/2013



**EQAR has improved QAA internal procedures, implementation of the ESG, visibility of European QA, agency reputation, and has been a catalyst for discussion of QA in its European dimension. On the other hand, there is no evidence of EQAR's effect on student mobility, barring accreditation mills or the transparency of QAA procedures. EQAR's impact on increasing trust and creating a joint European „market” for QA so far has been limited**

Bearing that in mind, the findings regarding EQAR's initial impact are as follows:

**1. EQAR has only slightly contributed to opening national QA systems for foreign QAAs**

- a) Official recognition of the registered agencies' decisions in other countries has begun to develop slower than expected. The small list of examples how national authorities have used the Register in practice is presented in the next chapter. Despite the establishment of EQAR, many European countries remain reluctant to devolve responsibility for external QA beyond national boundaries (EACEA 2012, p. 70) and their rationales are multifold (see chapter 3.5.1.2). In particular, even when the national legislation to recognise EQAR-registered agencies has been drafted, it usually envisages recognising their decisions under certain conditions and limitations (see chapter 3.5.1.1).
- a) At the same time expectations of students related to this role of the Register are increasing. Key users of the Register are now more confident that EQAR will induce opening the national QA systems for agencies from abroad, with 60% of national students unions sharing this expectation in 2012 (in 2009: 41 %, in 2007: 38 %).

**2. Registration on EQAR has not yet directly affected student mobility**

- a) Back in 2011, representatives of registered agencies interviewed by the Expert Panel declared that registration had not yet affected student mobility.
- b) There is evidence that national authorities are using the Register to facilitate the accreditation of high-mobility programmes, thus possibly indirectly enhancing student mobility. For example, Erasmus Mundus joint programmes offered by Danish and foreign HEIs in co-operation do not require additional accreditation by the Danish national QAA if they are accredited by another EQAR-registered agency (David, et al. 2011b, p. 11), thus reducing red tape for such programmes. Nevertheless, it is too early and too difficult to say whether mobility has increased as a result of Register's activity and in particular its influence on increasing trust among HEIs.
- c) There have been no studies regarding EQAR's impact on promoting student mobility and recognition. In particular, there is no evidence of national legislation or HEIs' practices promoting mobility to institutions based on their (or their study programmes') accreditation/external QA status. According to EQAR, there is a German proposal to use EQAR as a proxy for ensuring that study programmes abroad are subject to sound QA. A country representative suggested, that since student support (BAföG) is provided also to students studying abroad, it would be advisable to introduce regulation that student support is granted on condition e.g. that the programme was accredited by an agency listed on EQAR (Tücek 2012a, pp. 31–32). So far there is however no confirmation of this being implemented.

**3. There is no available data to make a reliable judgment of EQAR's impact on reducing opportunities for „accreditation mills” to gain credibility in Europe**

Currently, it is impossible to ascertain the impact of EQAR on reducing opportunities for „accreditation mills” in Europe. EQAR essentially functions as a white-list for QAAs. The more QAAs will be members of EQAR, the more importance will registration on the register gain in the HE community and the larger the demand for QA by an EQAR-registered agency will be from relevant stakeholders and prospective students.

**4. Registration has served as a transparency tool by recognising QAAs acting in line with the ESG**

- a) Registration on EQAR has undisputedly served as a transparency tool, as it testifies that QAAs act in line with the ESG (Vercruyssen, Proteasa 2012, p. 18). It is the first mechanism in Europe

intended to identify bona fide QAAs operating within the EHEA, independent of their status (public or private) or origin (inside or outside the EHEA) (Westerheijden, et al. 2010b, p. 36).

- b) There is a perception that EQAR has a strong „look” on QAAs and it is not easy for the agencies to get listed. This may contribute to a feeling that quality is assured everywhere among the EHEA according to the same, high standards (SH-Interview) which is important for building trust. EQAR is as a „brick”, a „module” to achieve it (SH-Interview).

**5. EQAR’s impact on increasing transparency of agencies assessments and QA in general has been more limited**

- a) EQAR’s impact on increasing transparency of the activities and assessments made by the registered agencies has been rather limited and below its potential, as becomes apparent in the findings in chapter 3.4.3.
- b) In 2006, the European Parliament and the Council of the European Union recommended that Member States *„ensure public access to the assessments made by the quality assurance or accreditation agencies listed in the European Register”*. The 2.5. Standard of the ESG requires agencies to publish reports from the evaluations, accreditations or audits they have conducted. Therefore, the reports of EQAR-registered agencies, which have evidenced through an independent external review process that they operate in substantial compliance with the ESG, should be publicly available on those agencies’ websites. Still, in 2009 EQAR reported that not all QAAs publish full reports of their reviews, some agencies do not publish information in cases where accreditation is denied, some only publish summarised reports or reasons on their website. The role of QAAs, as well as EQAR and ENQA in ensuring transparency is especially crucial, since, as pointed out by The Bologna Process Implementation Report, HEIs themselves are not willing to publish negative reports as eagerly as positive ones (see chapter 3.3.3). In this context, the registration on EQAR (along with ENQA membership) had a positive impact on transparency policies of QAAs as for the past few years, public access to the results of external QA evaluations/accreditations/audits has significantly increased.
- c) However, the information published is often not easy to access or understand, especially to users from other HE systems, due to its dispersion and the language(s) in which it is offered, but also because the reports vary significantly in terms of forms, structures, quality or depth (Vercruyssen, Proteasa 2012, p. 18;) (see chapter 3.3.3). In order to serve as a meaningful transparency tool for students and other users across EHEA, including non-academic beneficiaries, those reports need not only to be easily accessible but also easily comparable and adequate in size and language (Vercruyssen, Proteasa 2012, p. 18). However, there is until today no central register, nor a central format for QA results and the available information does therefore not yet allow for an easy, EHEA-comparable overview of recognised institutions/programmes.
- d) This is clearly visible in students’ perception of EQAR. Since 2009 students, one of the intended key users of the Register, have become more limited in their view about what EQAR can actually achieve in terms of impact. While in 2007, they generally thought that the Register could enhance transparency of quality of HE for students, this was less expected in 2009 and is now even less so in 2012 (Päll 2012, p. 129).

**6. The Register’s existence has given QA a more prominent role in discussions on HE beyond policy level**

- a) Several governmental and stakeholder representatives stated that the establishment of the Register has led to QA of HE (re-)gaining a prominent position in discussions on HE at both the European and national levels (Tück 2012a, p. 34).
- b) While BFUGs serve to discuss QA mainly on policy level, EQAR’s function as a meeting forum for governments, agencies and stakeholder organizations has been beneficial also for discussing QA implementation (SH-Interview)

**7. The Register has been a driver for implementing the ESG in external, as well as internal QA, thus for harmonising and improving European QA on all levels**

- a) EQAR, along with ENQA, has had a substantial impact on agencies across EHEA aligning their operations with ESG.
- b) Consequently, as argued in chapter 3.4.3, EQAR has acted as an indirect but powerful driver for implementing the ESG within HEIs.

**8. EQAR has contributed to improving the quality of agencies, primarily in internationalising the review panels, ensuring participation of students and promoting stakeholder involvement**

- a) EQAR, in using the ESG, has had a positive impact, primarily in internationalising the review panels, ensuring the participation of students, and further professionalising QA agencies (SURSOCK, SMIDT 2010).
- b) By reflecting stakeholder involvement as an obligatory feature in its requirements for external reviews of QAAs, EQAR has also strongly promoted a QA approach based on stakeholder cooperation (Tück 2012a, p. 34).

**9. EQAR has strengthened the position and reputation of registered QAAs at national, as well as at international level**

- a) Increased reputation with national, as well as international stakeholders was mentioned as a benefit of registration by EQAR-registered agencies in a survey conducted jointly by CHE-Consult and EQAR for the purpose of this study
- b) Right now, registration on EQAR seems to have greater importance on the national level (SH-Interview), being used by agencies to strengthen their competitive position on the domestic „market“ or standing towards national authorities. In the first years of EQAR’s operation, the majority of QAAs came from countries with several QAAs (Germany, Spain). As soon as one of the national agencies became registered, others consequently followed, in order not to lose reputation (SH-Interview)
- c) The agencies claim to use Registration as an important quality seal in order to demonstrate their legitimacy to HEIs and the public (EQAR 2010, p. 16). On the other hand, in stakeholders’ opinion agencies’ efforts to use their EQAR listing as a promotional tool are generally limited or even „cannot be observed“ (SH-Interview), especially in case of agencies operating solely in only one country and facing no competition

**10. EQAR’ registration has been used to strengthen the link of agencies’ home countries to the EHEA and enhance reputation of national QA systems**

- a) Governments see their agency’s membership as a way to link their country more strongly to the EHEA (SH-Interview)
- b) EQAR’s impact in that dimension is likely to be greater in countries with less developed HE systems. Agencies from such countries might derive relatively more benefit from being on the Register than agencies from countries with mature HE systems. In particular for some agencies, registration may not only confirm its quality and confer status, but also help to consolidate the country and its HE sector in Europe (David, et al. 2011b, p. 11).
- c) NVAO indicated increased reputation and visibility of the Dutch and Flemish sectors of HE as one of the pillars of its strategy and the main motivation to participate in international activities. Along similar lines, international activities of agencies are seen as (indirectly) helping to enhance recognition of local external evaluation procedures, thus increasing mutual trust and understanding (CHE Consult-EQAR Survey).

**11. The Register’s impact reaches outside EHEA**

Outside the EHEA, EQAR is more known and watched than ENQA (SH-Interview). Although there is no evidence to support this claim, EQAR states that many of the interviewed non-European agencies indicate the existence of EQAR as a key reason for aligning their activities with the ESG. This impact

could be significant, especially in terms of promoting some of the more „typical” (but not exclusively) European principles in QA, such as stakeholder involvement and publication of review reports, outside European borders (Tück 2012a, pp. 34–35).

## **12. Finally, EQAR’s impact on increasing trust, can so far only be measured via such tangible results as recognition of registered agencies decisions**

Finally, a well-functioning QA area should be identifiable by the trust HE stakeholders have in QA procedures and their results. The current approach (ESG and EQAR) to achieve this is based on the quality of QA and of QAAs, and not on the quality of education. The assumption is, that circumstantial evidence is de facto evidence. It seems trust can however only be gained by establishing that QA agencies at least trust each other. The trust between agencies is tangible when they recognise each other’s QA results and decisions.

Summing up, the initial impact of EQAR on QA across EHEA, has so far only slightly contributed to the achievement of the strategic goals set out for the Register by its founders. This is partly because EQAR is a relatively young organisation and it will take some time for it to reach its full potential and its activities to bear fruit. Moreover, the basis for achieving certain wider goals of EQAR, such as opening national HE systems for registered agencies or promoting mobility and recognition lies in measures which can and must be supported by EQAR, but ultimately are not within its direct power (Tück 2012a, p. 7). Without decisions at national level to recognise registered agencies decisions (see chapter 3.5.1), EQAR’s impact will not meet the desired objectives.

### **3.5 WHAT WERE THE DEVELOPMENTS REGARDING EHEA-WIDE RECOGNITION OF EQAR-REGISTERED AGENCIES?**

#### **EQAR has created necessary preconditions for EHEA recognition of QAAs and their assessments**

As demonstrated in the previous chapter, EQAR has created a number of necessary preconditions for international recognition of assessments by QAAs, by serving as authoritative European reference point for QAAs working in substantial compliance with the ESG (Tück 2012b, p. 2). Nevertheless, for EQAR to reach its full potential and the desired impact, i.e. to increase transparency, build up mutual trust and recognition of agencies’ assessments, thus contributing to the recognition of qualifications for the purpose of study or work in another country (2006 EU recommendation), legislative action at the national level for recognising EQAR-registered agencies is necessary.

Using the Register to promote and facilitate cross-border provision of HE, as well as to strengthen European cooperation in EQA, was recommended by the European Parliament and the Council of the EU already in 2006. In 2012, in line with this recommendation, 47 EHEA Ministers made an important commitment to allow EQAR-registered agencies to perform their activities across the EHEA, while complying with national requirements, by 2015, as well as declared they will aim to recognise QA decisions of EQAR-registered agencies on joint and double degree programmes (EHEA Ministerial Conference 2012, p. 2). This chapter aims to explore whether and how the national authorities have so far responded to the 2006 recommendation, as well as whether HEIs have used the existing legal possibilities to seek quality reviews by foreign agencies listed on the Register or used EQAR registration to facilitate and improve cross-border provision of HE.

#### **3.5.1 Have Member States taken steps at national level to officially recognise EQAR-registered agencies?**

##### ***3.5.1.1 Overview of existing policies; including: Are HEIs authorised to choose among EQAR-registered agencies as a substitute to the agencies active in their national context or for additional assessment? What are the legal practices regarding joint/double degree programmes?***

**Recognition of EQAR registered agencies can include allowing them to operate within the national HE system as well as recognising their decisions on joint programmes or transnational HE provision**

Recognition of EQAR-registered agencies at national level was intended to allow HEIs to turn to any registered agency for their regular or additional external quality review, as well as recognition of QA decisions by foreign, EQAR-registered agencies on joint programmes or transnational HE provision.

In 2006, the European Parliament and the Council of the EU, encouraged the establishment and use of the Register to facilitate recognition of qualifications for the purpose of study in another country, as well as recommended that Member States:

- a) enable HEIs active within their territory to choose among QA or accreditation agencies in the European Register an agency which meets their needs and profile, provided that this is compatible with their national legislation or permitted by their national authorities;
- b) allow HEIs to work towards a complementary assessment by another agency in the European Register, for example to enhance their international reputation.

**In 2009 there was virtually no evidence of national legislation recognising registered agencies but it was assumed countries need more time to satisfy themselves with EQAR's reliability and draft adequate legislation**

In 2009, when the first progress report had been released, there was virtually no evidence of a national government agreeing to allow an EQAR-registered agency from another country to operate in its own country or recognising QA decisions of EQAR-registered agencies on joint and double degree programmes (David, et al. 2011b, p. 11). Nevertheless, it was assumed that countries would only take such a step after having observed how EQAR operates for a period of time and having satisfied themselves of its reliability and integrity. The amount of time required for an initial idea to be developed into draft legislation and for a proposal to pass the parliamentary procedure also has to be borne in mind (Tüeck 2012a, pp. 36–37).

**Since then 9 European countries have allowed their HEIs to work with all foreign registered QAAs and 2 more have recognised decisions of all EQAR agencies on joint programmes**

As of April 2013, 9 European countries (Armenia, Austria, Belgium/Flemish Community, Bulgaria, Kazakhstan, Liechtenstein, Lithuania, Poland and Romania) allow their HEIs to work with foreign, registered agencies for their regular external evaluation, audit or accreditation procedures. 2 more countries (Denmark, Germany) recognise QA decisions of all EQAR-registered agencies on joint-programmes (Tüeck 2013, p. 18). Moreover, according to EQAR's knowledge, in a number of other countries legislative changes to that effect are being discussed (EQAR 2012).

On the one hand, bearing in mind the substantial time it takes for legislative change, the few examples which exist do reflect progress made on national levels in the short period since EQAR was established, as well as increasing trust in the Register and its agencies (EQAR 2012). On the other hand, these countries represent merely 23% of the EHEA. On a European scale, the developments are thus rather unsatisfactory and the list of Member States recognising EQAR-registered agencies definitely too short. In addition, even then, the type of legislation makes become active in other HE systems rather burdensome for EQAR agencies.

Furthermore, the following nuances, trends and problems related to the current state of play regarding recognition of agencies decisions have been identified.

**The few examples of opening national HE systems for EQAR agencies are not well-known, which contributes to the general feeling that so far EQAR had rather limited impact**

Upon adopting the Register, further consequences on the national level were requested, but didn't follow (SH-Interview). This perception among stakeholders and users of the Register is strong especially since the existing examples of national recognition of EQAR-registered agencies and their decisions are not sufficiently well-known (Tüeck 2012a, pp. 36–37).

## **Several EHEA countries recognise foreign QAAs based on other criteria than EQAR registration, especially for accreditation of particular study fields**

Several EHEA countries declare they allow their HEIs to work with foreign agencies, however based on criteria other than EQAR registration (e.g. Azerbaijan, Belgium (Flemish Community), Belgium (French Community), Bosnia-Herzegovina, Estonia, Finland, Netherlands, Portugal, Switzerland, Turkey) (Tück 2013, p. 10; EACEA 2012, p. 62).

In some HE systems, even if HEIs are unable to be evaluated by an agency outside the country, they are free to seek accreditation for particular study fields by international accrediting organisations (EACEA 2012, p. 63), but without any formal consequences within the respective HE system. As of the end of 2012, 4 of the EQAR-registered agencies were sectoral agencies i.e. primary reviewing institutions or study programmes within one or a few academic disciplines or professional fields (Tück 2013, p. 3).

## **The adopted principles of recognition vary greatly but typically decisions of EQAR-registered agencies are accepted under specific conditions and limitations**

Whether or not QA decisions and results are recognised within a national jurisdiction depends not only on the commitment of governments (and other actors) to the European QA infrastructure, but also on the adopted principle of recognition of registered agencies. The following overview of the existing national legislation on the role of EQAR, clearly indicates that EHEA-countries have adopted various principles of recognition, mostly accepting the decisions of EQAR-registered agencies under specific conditions and limitations, rather than allowing HEIs to freely choose any agency from the Register and/or use its decisions on joint programmes: (Tück 2013, p.9-10)

### **1. Armenia**

All HEIs are able to choose a foreign EQAR-registered QAA, as long as it is deemed eligible by the National Center for Professional Education Quality Assurance Foundation (ANQA) governing body. An institution applying to a foreign agency should have a prior agreement with ANQA and the ANQA Board needs to endorse the QA assessment.

### **2. Austria**

Austrian public universities are obliged to undergo regular institutional audits by the Austrian national QA agency or any other agency that is included on EQAR. Foreign agencies need to apply the assessment areas defined by the Law. The same rules apply to university colleges after having been initially accredited (Tück 2013, p.9.) However, if an audit, which always also results in a „certification“, is failed, the follow-up audit must be conducted by Austria’s national agency (SH-Interview).

### **3. Belgium/ Flemish Community**

HEIs in the Flemish Community of Belgium can choose to have their review for accreditation carried out by EQAR-registered agencies. Such reviews will be the basis for accreditation of study programmes by the Accreditation Organisation of the Netherlands and Flanders (NVAO). While all EQAR-registered agencies are automatically entitled to carry out the assessment reviews, they have to agree the Terms of Reference with NVAO.

### **4. Bulgaria**

Bulgarian HEIs have the possibility to commission a foreign EQAR-registered agency for their compulsory accreditation, at programme as well as institutional level. The foreign agency will have to use the same criteria and mark-based system as the national agency, NEAA.

### **5. Denmark**

Erasmus Mundus joint programmes, offered by Danish and foreign institutions in cooperation, do not require additional accreditation by the Danish national QAA, if they are accredited by any EQAR-registered agency. Danish institutions may only issue Danish degrees for programmes offered abroad if they are accredited either by the national Danish agency or an „internationally recognised“ agency. If an agency is registered on EQAR, it is automatically considered „internationally recognised“; otherwise, it has to prove this in an individual procedure to the Danish authorities.

## 6. Germany

For periodic accreditation of their study programmes or QA systems German HEIs can choose amongst QA agencies that are accredited by the German Accreditation Council, a national regulatory body. These agencies can also ratify individual accreditation decisions by other agencies on joint programme between a German and foreign institution. This is subject to the agency being registered on EQAR or a full member of ENQA.

## 7. Kazakhstan

Institutions are subject to periodic institutional and programme accreditation. They can have their programmes accredited by any QAA listed on the Kazakh national register of accreditation bodies. QAAs from other EHEA countries can be included on the national register of agencies subject to the condition that they are EQAR-registered. Moreover, both Kazakh and foreign agencies on the national register will not need to undergo a review by the Kazakh authorities if they are registered on EQAR, since registration guarantees that agencies re-evidence their substantial compliance with the ESG through an external review every five years.

## 8. Liechtenstein

Liechtenstein legislation requires the HEI to seek accreditation by any EQAR-registered agency. The country has decided not to establish an own national agency.

## 9. Lithuania

Lithuanian HEIs are subject to regular accreditation at both institutional and programme level. For programme accreditation HEIs can opt for an external review undertaken by any EQAR-registered agency. The actual accreditation decision, however, remains the responsibility of the national QA agency, SKVC.

## 10. Poland

Polish HEIs may request foreign EQAR-registered agencies to conduct an external accreditation review, whereas the accreditation decision is taken by the Polish Accreditation Commission (PKA, the national agency). HEIs are further required to be reviewed by an EQAR-registered agency in order to apply for the right to offer doctorate degrees. Foreign HEIs, accredited by any EQAR-registered agency, have the right to establish branch HEIs or departments in Poland. This is, however, only one of many requirements to do so.

## 11. Romania

HEIs in Romania are subject to (initial) accreditation by the national QA agency, ARACIS. Once the HEI is accredited it is obliged to undergo periodic external evaluations. For these evaluations, HEIs can choose freely from amongst the registered agencies.

### **Many European countries remain reluctant to devolve responsibility for external QA beyond national boundaries creating a barrier for the development of a common European QA dimension**

Based on hitherto evidence, it can generally be concluded that despite the establishment of EQAR, many European countries remain reluctant to devolve responsibility for EQA beyond national boundaries (EACEA 2012, p. 70). This constitutes a serious problem and a barrier for building a common, European QA „market” that is needed to strengthen EHEA position on the global HE market (SH-Interview). However, being granted the right to perform QA in EHEA is the incentive without which EQAR cannot become attractive for non-EHEA agencies (BFUG Working Group on Mobility 2012, p. 9).

#### **3.5.1.2 Barriers to opening national HE systems for EQAR-registered agencies**

Many stakeholders point to the lack of political willingness to truly open up national HE systems for foreign agencies (SH-Interview). Some attribute this to an unspecific apprehensiveness and caution. Some doubt whether the vision of a common European QA dimension is indeed shared among stakeholders as even some governmental, fee-paying, board members of EQAR state that they are not

going to allow registered agencies to operate in their countries (SH-Interview). In the view of CHE Consult, a number of other potential factors need to be discussed:

**1. Ministries may fear to lose control over their national HE system, particularly in countries where decisions on HEIs/programmes' funding or existence are based on the outcomes of QA**

Governments may fear to lose control over their national HE system, especially when the decision to grant institutions' or programmes' funding or permission to operate is based on the outcomes of EQA (SH-Interview, EACEA 2012, p. 63). This perception may not only hold back countries from opening their QA systems but is also echoed by the adopted pattern of recognition with the final decision on accreditation often reserved for the national QAA or the pertinent ministry. The overview of existing legislation recognising EQAR-registered agencies (see chapter 3.5.1.1) clearly shows that no European country has so far delegated to foreign agencies any decision-making power which can result in changes in funding or the existence of HEIs. Even Austria, often heralded by EQAR as a prime example, does prescribe that the HEIs are to be audited by the national agency, if the result of the first (foreign) audit was negative.

**2. Ministries may doubt whether national quality criteria are adequately checked by foreign agencies**

QA of HEIs must check national criteria regarding programmes and institutions. Since competition between agencies would most probably be decided about the price, there will always be a latent fear of accreditation mills, as governments may doubt whether foreign QAAs thoroughly check the national criteria (SH-Interview). Indeed, within the current structure there is nothing that would stop price dumping or an agency from not consistently applying their criteria. Indeed, EQAR currently has no possibility to check the quality of its agencies actual reviews and would therefore have little chances of getting substantiated information (SH-Interview).

Ministries may also believe that their own QA system is closer to specific national needs and be distrustful of agencies they cannot directly influence. Indeed, many of the difficulties with culture, language and knowledge of local HE traditions and specificities reported by QAAs as barriers for their international activities (see chapter 3.4.1), were repeated when asked why countries choose not to open their „market“ to EQAR-registered QAAs. In part because of these difficulties, there still seems to be a fear that HEI's may try to „escape“ the control of the national QA and opt for an international evaluation with a foreign agency which does not know the context and will have difficulty correctly assessing the reality on the ground.

A last potential reason to be taken into account may be the effect of cultural prejudice (ministries, QAAs as well as HEIs from richer European countries may have a low opinion of the quality and integrity of QAAs from poorer countries, regardless of their actual quality).

**3. Ministries may want to keep closer control over the quality of the institutions they fund**

Without any doubt, it is easier to monitor a QA system with just one agency which regularly communicates with the ministry than several foreign agencies which only visit a country for a review. Having relinquished a large degree of control over their HEIs, while still providing the bulk of their funding, ministries have a strong and justified interest in a high degree of accountability. It is understandable that ministries are cautious to trust that a foreign agency can assure the same degree of information than a local agency could.

**4. National QAAs may be afraid of competition**

Local monopoly agencies may lobby governments against opening their home systems to others because of the fear of competition.



**5. Agencies and governments do not clearly see the added value of creating the international „market“ of QAAs. Even among EQAR-registered QAAs, there are obvious doubts about the goal of creating a common European „market“ for EQA**

Aside from the above-mentioned reservations, governments may not see the added benefit of having international QAAs being active in their HE system. Governments may not be alone in this point of view. As one QAA responded to the joint CHE-EQAR:

*„Before envisaging such an action, reasons for becoming internationally active should be thought through. Becoming international for the sake of claiming so wouldn't make much sense without a thorough reflection on what the QAA could bring as an added value (complementary with other approaches? New boost to QA in some countries?), could find as possible development opportunities, and, last but not least, could envisage for this internationalisation exercise as being/becoming part of its "corporate" identity. Likewise, governments could think about possible synergies or incompatibilities (regarding their HE system, existing constraints on HEIs, academic and quality culture...) of external international reviews, before ruling in the matter.*

*I'm not particularly in favour of the development of an international „market“ of QAAs- I do not really see the point for an agency of a country A to work for a HEI of a country B (except for profit) or for an HEI of a country A to ask to be evaluated/accredited by a QAA of a country B (except for escaping its national QAA!); however, I measure the interest for agencies of collaborating, particularly for the double benefit of: bringing a specialised expertise (as it is the case of engineering with the CTI, music with the EAC; whereas [my agency] is a generalist agency) and giving both agencies an opportunity for bench-learning. As to the „international argument“, I'd say that [my agency] employs an average of 50-70% of foreign reviewers, which in my opinion, gives sufficient international dimension to external QA"*

**6. Openness for international EQA also depends on the national context. Small countries and/or countries with less developed QA systems are more likely to open their borders**

Finally, In general, the profile and specificities of the country may determine a country's openness for external QA by foreign agencies. Smaller countries with new or non existing external QA structures are likely to be more open than bigger countries with a more developed external QA system (Liechtenstein being a good example to support this claim). The need for recognition may appear more obvious in some national contexts than in others.

**Some of the lack of trust in EQAR-registered agencies can be attributed to the current content and formulations of the ESG**

Some of the barriers have a clear link to the nature of the current ESG. Comparability of EQAR-registered agencies is limited to the ESG. Trust in the quality of the activity of EQAR-registered agencies must therefore rationally be limited by the subjects covered by the ESG. Next to the quality of QA procedures, national governments are interested in the quality of education itself. Currently, however, the ESG does not contain any criteria related to the level or quality of education. To close the existing gap in trust, the ESG (or EQAR) should include references to QFs and LOs. In addition, any national requirements which are not covered by the ESG must also be checked by foreign agencies conducting national QA procedures. To enhance trust, EQAR should include a requirement that agencies must check national criteria when replacing national QA procedures, something which is not yet the case. EQAR must explain why governments can trust in the quality of its registered QAAs and part of this explanation needs to be based on complete criteria provided by the ESG and EQAR.

It is clear that obliging QAAs to check national requires may seem to create additional barriers. From a pan-European and a QAA point of view it may seem more preferable to eliminate national criteria and create a veritable European framework for the assessment of the quality of education. However, it is hardly conceivable that Member States would be willing to surrender such an important area of influence to supranational bodies, except for a limited part of programmes (e.g. joint programmes). Therefore this option seems rather unrealistic for the short and medium term.

**Because of the above mentioned barriers, despite high stakeholders' expectations it is by no means evident that evaluation from foreign agencies will soon become commonplace in the EHEA**

Because, as demonstrated above, national responsibility for QA could be seen to be challenged by such practices, it is by no means evident that evaluation from non-national agencies will soon become commonplace in the EHEA (EACEA 2012, p. 63). Employers, in particular, do not envisage a totally free QA „market“ in the next years, suggesting there will be a Europe of two speeds: the ones who want (and are able to accept the free market) and the ones who don't (SH-Interview).

**A genuine Pan-European dimension for EQA is a promise for the future**

The Study's research team acknowledges and bears in mind all of the above quoted and presented barriers, critical views and challenges related to creating a free, European „market“ for QAAs. EQAR is currently indeed a promise for the future (SH-Interview). Whether or not this promise can be delivered on will be decided by the revision of the ESG and the subsequent ability of EQAR to make a strong case for the quality, reliability and soundness of its member agencies' QA procedures. For the short and medium term further development of the European QA dimension and thus further internationalisation of EQA is required, including increased internationalisation of QAAs (in terms of internationalisation of review panels, bench-learning and cooperation between agencies, cross-border activities of agencies, as well as more consistent implementation of the ESG), adopting a common European approach to accreditation of joint programmes, as well as stronger efforts to make a clearer distinction between assessing quality of HE (based on ESG) and assessing its compliance with national requirements (often not quality related). A first step can be to allow foreign EQAR agencies to operate in other Member States, but leaving the final accreditation decision to the national agency. These changes will definitely take time and cannot be enforced, however the idea of a strong, pan-European cooperation in EQA, with EQAR-registered QAAs being able to conduct obligatory and complementary EQA in all HE systems, should not be abandoned.

Strengthening European cooperation in EQA would be beneficial for the EHEA as a whole, by enhancing quality of European HE according to common quality standards, not dependent on national (non-quality) requirements, contexts or pressures and by presenting a strong, unified message to the other regions of the world. In many cases, especially when it comes to smaller HE systems, foreign QAAs can prove to be more effective in identifying the weakest aspects of an HEI or programme, as well as in finding relevant facilities. The informal consultations with European HEIs reveal that currently (particularly in countries with only one national QAA), there are certain doubts regarding true independence and objectivity of panel members. Sometimes, EQA can be used to show an expert's superiority, satisfy his/her personal ambitions or even to eliminate a competitor HEI. Moreover, there are voices that although the European QA Framework empowers HEIs' autonomy and their responsibility for the quality of HE provision, the ever growing and often very detailed national requirements often hinder this key principle of QA, creating a risk of having a counter effect on the quality of education. The ability to request EQA from a foreign, EQAR-registered agency would strengthen HEIs autonomy and enable a truly European approach to QA, based on a wide international perspective, specialised expertise and sharing of good practices.

Evidently, various conditions, highlighted above, will need to be reflected on and met, in order to strengthen the European cooperation in EQA. Action to address the valid and existing concerns presented in this chapter needs to be taken, primarily with regard to the ESG revision and EQAR development. Last but not least, in the opinion of the Study's research team, the common goal should be to „strengthen pan-European cooperation in EQA“ or „develop a common European dimension for EQA“, rather than to „create a common market for EQA/QAAs“ in order to prevent profit-based competition between agencies and (profit-based) increase in cross-border activity, as well as to avoid the controversies regarding the term „common market“ in relation to quality of education. In particular, the question of funding obligatory EQA must be taken into consideration, since the current policy differs among various EHEA countries. Cross-border EQA should not be driven by profit related reasons, and on the other hand HEIs' choice of an agency should not be limited by financial constraints (especially since in many countries obligatory EQA conducted by the national QAA is free of charge for HEIs).

### 3.5.2 Have HEIs exercised the right to request quality reviews by foreign EQAR-registered agencies?

#### There is no systematic data collection on QAA's cross-border activities

In 9 countries, HEIs are allowed (and in case of Liechtenstein, obliged) to request quality reviews by foreign, EQAR-registered agencies. At the end of 2012, 12 QAAs listed on the Register operated in more than one country, mostly on the basis of voluntary assignment by HEIs (EQAR) 2010, p. 10).

Nevertheless, as of today, like in 2009 (David, et al. 2011b, p. 11) there is limited information on the scale and the nature of these practices. The reason for this is that there is no systematic data collection on QAA's cross-border activities.

#### To shed some light on the scope of international QA activities, CHE Consult has conducted a joint survey with EQAR among registered agencies

As a provisional remedy to this situation, CHE Consult has conducted a joint survey with EQAR to shed some light on the scope of international activities. Within the survey, 10 EQAR-registered agencies<sup>31</sup> have indicated the countries and the number of their cross-border activities. They were then asked to provide a description of the activities, as well as a list of the HEIs/ programmes that have been reviewed by the QAA in the respective countries since 2009. The following maps may, while being far from representative, be indicative of patterns of activity.

#### Responding EQAR-registered QAAs operated mostly in Germany, Austria, Spain, Finland and France

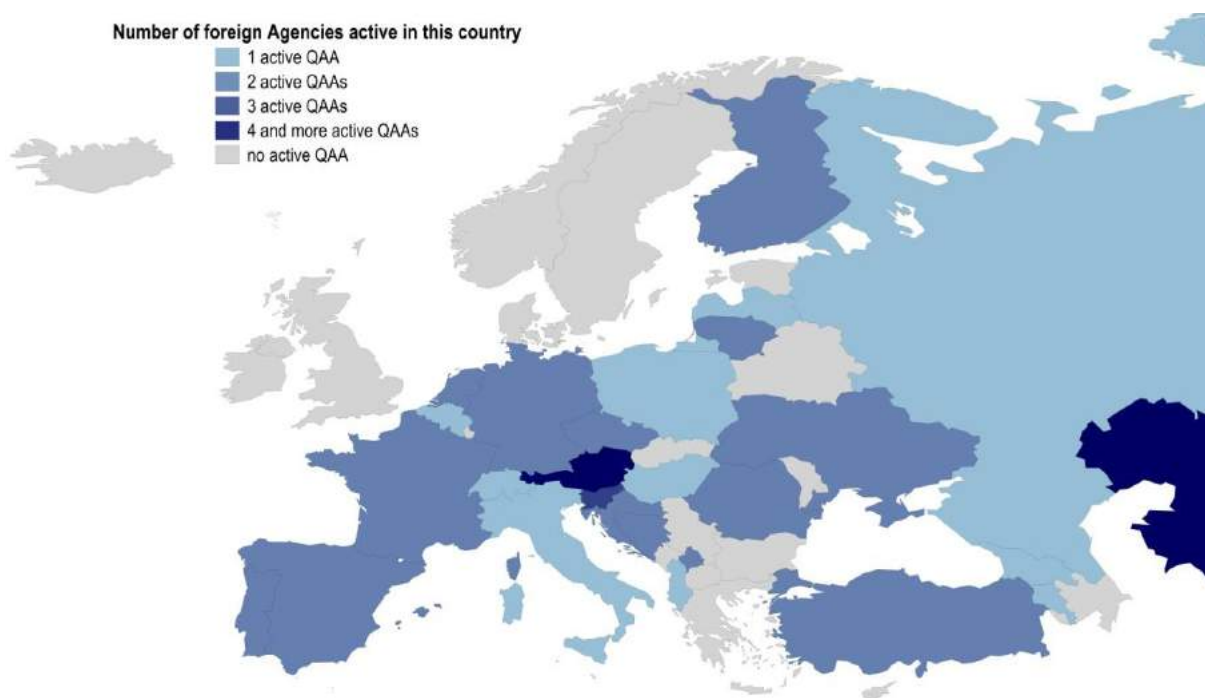


Figure 6: Number of foreign EQAR-registered QAAs operating in other EHEA countries<sup>32</sup>

<sup>31</sup> The respondent agencies were ACSUCYL (Spain), ACSUG (Spain), AQU Catalunya (Spain), ASIIN (Germany), evalag (Germany), FIBAA(Germany), IEP (international), OAA (Switzerland), QANU (Netherlands), VLUHR, former VLHORA (Belgium)

<sup>32</sup> Countries in each category with EHEA country code: 1 active QAAs (AL, AM, BE, BG, CH, CY, DK, EE, EL, IE, IS, IT, LV, NO, RS, SE, SK, UK); 2 active QAAs (BA, CZ, ES, GE, HR, HU, LT, PL, PT, RO, RU, TR, UA, XK); 3 active QAAs (FI, FR, KZ, LI, NL, SI); 4 and more active QAAs (AT, DE); no active QAA (AZ, BY, LU, MD, ME, MK, MT).

It becomes evident from Figure 6 that among the respondent agencies, Austria, Kazakhstan, Slovenia, Germany, Finland, the Netherlands and France attracted a largest number of foreign EQAR-registered QAAs. The data, however, may be slightly misleading since the IEP, an EQAR-registered agency, which does in no case replace national QA procedures, is active in a large number of countries. The following map shows the patterns without the IEP activities:

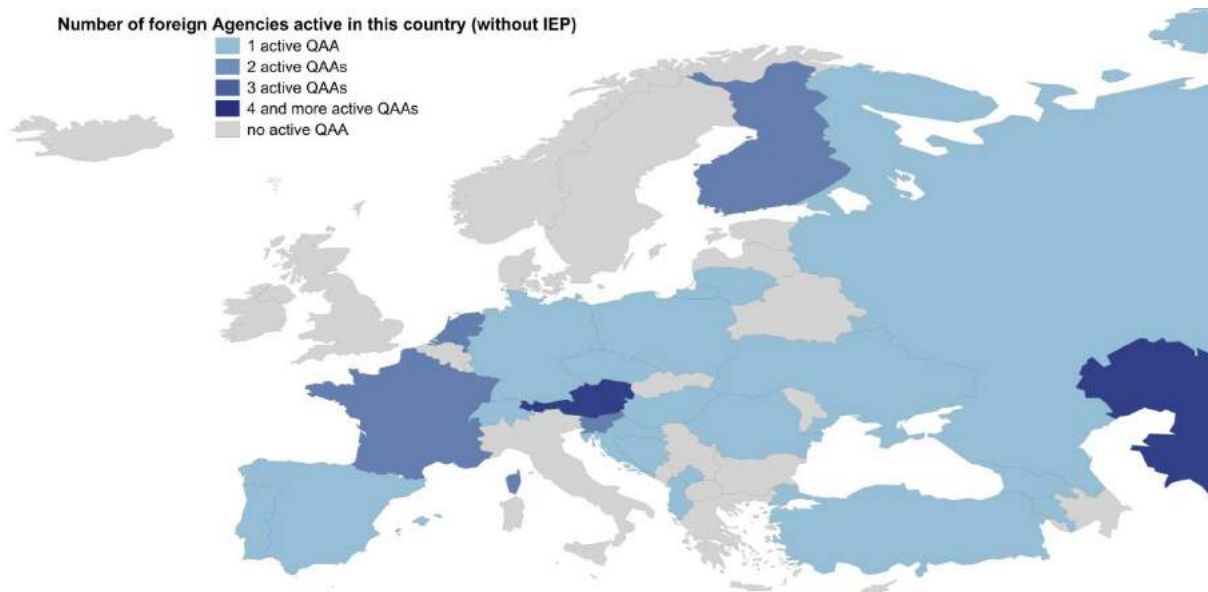


Figure 7: Number of foreign EQAR-registered QAAs operating in other EHEA countries (without IEP)<sup>33</sup>

Figure 8 confirms the initial picture but also shows that there is a large number of countries, especially in Northern, Central and Eastern Europe, with little or no agency activity.

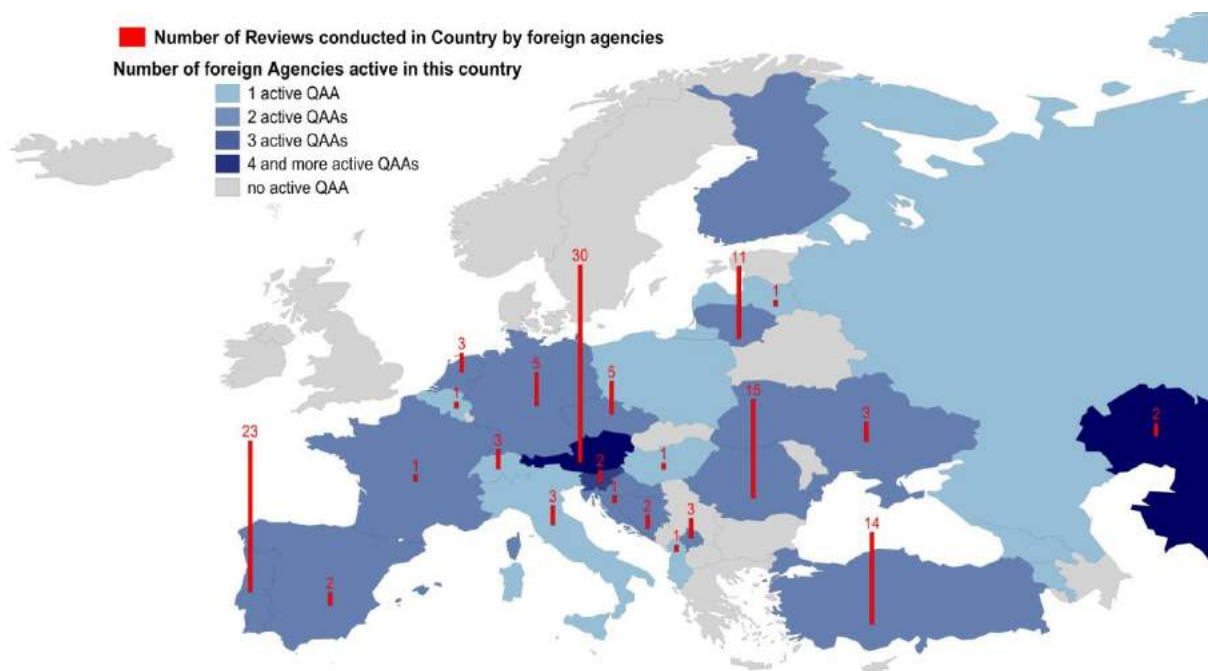


Figure 8: Number of QA procedures per country conducted by foreign EQAR-registered QAAs<sup>34</sup>

<sup>33</sup> Countries in each category with EHEA country code: 1 active QAAs (AL, AM, BE, BG, CH, CY, DK, EE, EL, IE, IS, IT, LV, NO, RS, SE, SK, UK); 2 active QAAs (TR, BA, CZ, ES, GE, HR, HU, LT, UA, PL, PT, RO, RU, XK); 3 active QAAs (FI, FR, KZ, LI, NL, SI); 4 and more active QAAs (AT, DE); no active QAA (AZ, BY, KZ, LU, MD, ME, MT).

Figure 8 reveals a heterogeneous picture. There are some countries in which several agencies have conducted only one review each, while there are others in which a single agency has conducted a large number of reviews. In the case of Portugal, Romania and Turkey, this was the IEP which carried out system-wide evaluations upon the invitation of the local governments. The majority of activities were legally mandatory and voluntary programme accreditations, with institutional accreditations and audits taking second place.

It is clear that the above picture does only give a very rough estimate of the pattern of cross-border QA activities of EQAR-registered agencies. During the study it became evident that based on currently collected data, it is impossible to know if HEIs have exercised their right to request quality reviews by foreign EQAR-registered agencies.

### **3.5.3 What improvements are desirable? How might EQAR develop and act further with a view to best achieving its mission and objectives?**

#### **Recommendations for EQAR**

Based on the desk-research findings, as well as interviews with stakeholders, the Study's research team is convinced that EQAR should focus on implementing its **Strategic Plan for 2013 – 2017** adopted by the EQAR General Assembly in March 2013. EQAR's efforts should thus concentrate on promoting, through the Register, international trust and recognition of registered agencies, their results and decisions throughout the EHEA and increasing transparency of EQAR's work and ensuring that information provided by EQAR is meaningful to its users.

#### **EQAR should play a greater role in strengthening pan-European cooperation in QA**

EQAR should definitely play a greater role in dispelling fears and removing barriers to cross-border QA, by adopting a more proactive and regulatory approach towards agencies, e.g. oblige QAAs to:

- include QFs and LO into their EQA processes,
- check HEIs' compliance with national criteria, when replacing national QA procedures,

and by explaining why governments can trust in the quality of its registered QAAs. Currently, EQAR has no way of assuring itself that QAAs indeed follow the ESG or check national criteria, when operating in other countries. EQAR should therefore develop a mechanism for controlling the quality of its registered QAAs' activities in other countries.

#### **EQAR could play a more prominent role in promoting transparency of QA and trust in its results**

Thus far, information offered by EQAR is limited to basic information on the registered QAAs and their types of activities, as well as, since December 2012, the Register Committee's decisions on all eligible applications for inclusion on the Register, including the reasons for the decisions (Tück 2013, p. 6). The information missing from EQAR's website is not only the one on the results of agencies activities. As suggested by Register's users and stakeholders, it would also be relevant to provide information on the national QA systems, including the place of registered agencies within them and information on the formal recognition of registered agencies in the countries within which they operate. While these are all highly recommended developments, EQAR points out that *„keeping up-to-date information on the review activities and results of the registered agencies regarding institutions or programmes or on national QA systems would cause a significant additional workload and could not be handled with the resources currently available”*. According to EQAR, within the current resources, the only feasible way to provide information on national QA systems would be if Governmental Members were able to deliver it. EQAR points out this would be an avenue for greater involvement of Governmental Members but would

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<sup>34</sup> Some agencies reported the country in which they operated, but not the exact number of reviews they conducted in the respective countries. This is the reason why there are 3 agencies have reported operating in Kazakhstan, but only two reviews have reportedly taken place.

require that EQAR establishes processes to ensure that the information is of comparable quality and depth (Tück 2012a, pp. 37–38). On the other hand, for EQAR to publish information on the evaluated institutions and programmes, more involvement from registered QAAs, including regular reporting of their activities, will be necessary.

In addition to information on QAAs and HE system, the General Assembly of EQAR should consider establishing a **shared European register of those HE programmes and institutions which have undergone quality assurance by an EQAR-registered agency** (see also chapter 3.3.5.1). ECA's Qrossroads (see chapter 3.6.2) is an initiative in this direction, but it will need to be better integrated in the European QA architecture to become truly useful to its potential users. For this to be feasible, however, more funding for EQAR will be necessary.

**EQAR should furthermore oblige all of its registered QAAs to submit yearly updates on their QA activities carried out in another legislation than the one they were founded to operate in.**

This update should be conducted once per year and contain a list of QA reviews performed across borders, the status/recognition of these activities, whether they substitute legally required QA procedures in the context they were performed or whether they were undertaken in addition to legally required external QA procedures. In case the agency has cooperated with other QAAs, they should indicate with which QAAs they have worked, and what the aims and objectives of this cooperation were (e.g. accreditation of joint programmes). The survey can be used as a component of regular internal QA of EQAR and be expanded with questions on the agencies' perspective on current issues and the future development of EQAR. This information should be published in EQAR's register of quality-assured programmes and institutions.

#### **EQAR should improve communication towards stakeholders**

In particular, since visibility of EQAR is growing but mainly among QA professionals (SH-Interview), EQAR should review and enhance its information policy towards different target groups, in particular HEIs, students and employers. EQAR should explore on how it can better serve those users of the Register (SH-Interview). The available data shows that there is still much to be done in terms of making the Register more useful, readable and therefore more influential for students. 7 national students' unions affirm that they still don't know EQAR at all or not in detail, while the percentage of unions that fully support the idea of establishing EQAR remained the same since 2009 (62 %) (Päll 2012, p. 128). Moreover, a substantial number of students' unions do not necessarily see EQAR to be supportable from a student point of view, or are not sure (Päll 2012, p. 133). According to the Bologna with Student Eyes 2012 report this shows „*that for students to believe in EQAR to be a useful institution, EQAR must go beyond being just a register*” (Päll 2012, p. 133). Become more proactive in promoting registration and recognition of registered agencies, in gathering and publishing data on evaluated and accredited HEIs and programmes.

#### **Other recommendations**

1. A significant barrier to implementing the above mentioned recommendations is that currently all EQAR-activities are essentially run by its director and changing project officers. There is an obvious mismatch between **EQAR's resources**, its stakeholders' expectations and the high expectations outside Europe. A wider governmental membership and agencies base is crucial for EQAR to be financially self-sufficient.
2. The EC / The European Parliament and the Council of the EU should recommend that all Member States join and support EQAR structures as Governmental Members in order to contribute to building a common, European QA dimension. EQAR should promote **governmental membership** amongst non-member EHEA countries, through the BFUG structures and direct contact.
3. The EC / the European Parliament and the Council of the EU should renew and further specify their recommendation that all Member States allow their HEIs to request evaluation, audit or accreditation from any EQAR-registered agency to fulfil their EQA obligations, as well as **recognise the decisions of all EQAR-registered agencies** on joint-programmes and cross-border provision.

4. The EC should strongly and actively promote the European QA dimension and the use of EQAR among Member States, helping to explain and communicate the idea across the EU.
5. Member States should draw national legislation or adopt other measures to encourage national QAAs to seek registration on EQAR, and thus meet their Bucharest commitment.
6. EQAR (the organisation and its members), registered agencies, Member States and the EC should actively promote the Register and its use among the EHEA community and beyond. EQAR should organise peer-learning seminars for Governmental Members and representatives of other EHEA countries on the possibilities, benefits and challenges linked to the recognition of registered QAAs.
7. EQAR (the organisation and its members), the EC and national governments should actively promote recognition of EQAR-registered agencies as a way to facilitate the EQA process of joint programmes and cross-border HE provision. It is recommended that EQAR cooperate with ENQA on this matter.
8. EQAR should continue to gather and analyse data on national legislation in EHEA countries recognising registered agencies and their decisions on a regular basis. The EC and EQAR (the organisation and its members) should promote and disseminate information on existing legislation recognising registered agencies and their decisions as examples of enhanced trust in the Register, its agencies and the common European QA dimension (see chapter 3.3.5).
9. The revision of the ESG should take account of the ESG's importance in underpinning trust in EQAR-registered agencies and thus in increasing the willingness of public authorities to recognise registered agencies in their systems, and ensure that the specific challenges of cross-border QA are considered. The revised ESG should link QA to other Bologna lines, especially QFs and LO, to ensure that EQAR-registered agencies truly certify quality of HE provision, not only quality of QA.
10. EQAR should set itself apart from ENQA. ENQA could focus on part III of the ESG and be more inclusive as an umbrella organisation for QAAs. EQAR could then focus more on part II of the ESG and add further requirements regarding quality of education.

The recommendations made in other chapters, related to yearly updates of EQAR-registered agencies, as well as the establishment of a European wide register of recognised institutions and programmes, would help to convince governments to open their HE systems to foreign agencies.

### **3.6 WHAT WERE THE DEVELOPMENTS REGARDING OTHER STRUCTURES, TOOLS AND INITIATIVES AIMED AT BUILDING MUTUAL TRUST, RECOGNITION OF QA/ACCREDITATION ASSESSMENTS AND RECOGNITION OF QUALIFICATIONS FOR THE PURPOSE OF STUDY OR WORK IN ANOTHER COUNTRY?**

#### **3.6.1 What were the general developments regarding QFs and recognition? How have they affected/been related to QA?**

##### **The implementation of NQF has taken much more time than expected and still has not been finished**

In 2005, at the Bologna Ministerial Conference in Bergen, Ministers adopted the Framework for Qualifications of the European Higher Education Area (**QF-EHEA**, EHEA Framework), with generic descriptors for three cycles based on LOs (consistent with the Dublin Descriptors) and competences, as well as credit ranges for the first and second cycles, and committed to elaborating compatible national qualifications frameworks (**NQF**). This commitment was further reinforced in the 2007 London Communiqué, which stressed the importance of QFs as instruments for achieving comparability and transparency within the EHEA, facilitating mobility of students and supporting HEIs in the development of modules and study programmes based on LOs and credits, and in the recognition of qualifications as well as all forms of learning. Additionally, in 2008 the European Union formally adopted The European Qualifications Framework for Lifelong Learning (**EQF**) encompassing all (8) levels of education,



valid for EU countries, EU accession countries and countries of the European Economic Area<sup>35</sup>. Despite different wording, the EQF initiative is closely related to the EHEA Framework; the two frameworks are compatible and their implementation coordinated (the QF-EHEA is explicitly referred to as complimentary to EQF)<sup>36</sup>. As recognised by Ministers in the 2007 London Communiqué, NQFs will be compatible with the EQF and the QF-EHEA, with the latter being seen as the „face”, i.e. central element of the promotion of European HE in a global context<sup>37</sup>. The ministers aimed at an implementation until 2010 but already postponed this by the next conference (Bienefeld 2008, p. 12, Eurydice 2010, p. 14). In 2009, Ministers of the Bologna Process committed to completing their NQFs and having them prepared for self certification against the QF-EHEA by the end of 2012 (EHEA Ministerial Conference 2010). At the beginning of 2012, however, only 21 countries were reportedly in the final stages of preparing and certifying their NQFs and 16 in the middle of this process. Still, five countries were apparently far away from meeting their commitments (Bologna Working Group on Qualifications Frameworks 2012, p. 1). One reason for the delay as well as a barrier in introducing NQFs may have been the existence of two overarching European frameworks (SURSOCK, SMIDT 2010, pp. 59–60).

### **The orientation at LOs is equally important as the implementation of NQFs**

Regarding the institutional level, in 2009, according to national reports, in half of EHEA countries all or most HEIs were reported as having described their programmes in terms of LOs. Those declarations were seen as overly optimistic, especially in the face of results of a survey carried out by the Qualifications Frameworks coordination group, which showed the implementation of LOs is still the greatest challenge for the implementation of QFs (Rauhvargers et al. 2009, p. 53). This however is considered to be much more important than the implementation of NQFs as such (SH-Interview). The orientation at LOs and the implementation of adequate assessments is seen as a prerequisite for an easier future recognition procedure. The benefits of QFs, LOs and ECTS (hinging fundamentally on learning outcomes) therefore should be better explained to academics and students (SURSOCK, SMIDT 2010, p. 65). Although there was some progress in developing NQFs, institutions' understanding seems still rather limited (SURSOCK, SMIDT 2010, p. 8). While the number of HEIs finding existing NQFs useful has grown from 24% in 2007 to 38% in 2010 this is still a minority (SURSOCK, SMIDT 2010, p. 60). The gap follows the borders of disciplines rather than of nation states. In particular, Eastern Europe may be lagging behind Western European countries (SH-Interview).

### **It will take time to build mutual trust based on QFs**

Compatible and comparable quality of education does not result from compatible QA systems but from combined meaningful LOs and QFs (Westerheijden et al. 2010b, p. 36). Hence there is a broad agreement to include the recognition procedures (based on QFs and LOs) into the ESG (part I) (EACEA 2012, p. 58, Rauhvargers 2012, p. 22, SH-Interviews). In some countries IQA mechanisms in HEIs already monitor the quality of recognition procedures. According to the results of the BFUG survey for the Bologna implementation report, in 12 countries this is also the case for EQA procedures (Rauhvargers 2012, p. 13). As the ESG reviews of QAAs are actually varying from one country to another to a large extent, it will take some time until international trust will be able to be built on this approach (Westerheijden et al. 2010b, p. 37). Nevertheless, in some countries, QAAs have successfully used the QFs to push HEIs to the shift from teachers' to learners' perspective (Crozier et al. 2011, p. 11). In the long term, QFs will be important transparency tools and thus contribute to a fair recognition. From this point however it will be still a long way to go to automatic recognition (Rauhvargers 2012, p. 7).

### **Recommendations**

1. The activities to implement NQFs in all EHEA countries should be strengthened.

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<sup>35</sup> <http://www.ond.vlaanderen.be/hogeronderwijs/bologna/qf/overarching.asp> (last visited on April 27)

<sup>36</sup> [http://ec.europa.eu/education/lifelong-learning-policy/eqf\\_en.htm](http://ec.europa.eu/education/lifelong-learning-policy/eqf_en.htm) (last visited on April 27)

<sup>37</sup> <http://www.ond.vlaanderen.be/hogeronderwijs/bologna/qf/overarching.asp> (last visited on April 27)

2. The link between QFs, QA and recognition should be enhanced. The ESG should explicitly refer to QFs and recognition procedures (based on LOs) and thereby support their successful implementation.
3. In parallel, the awareness and the understanding of LOs among academic staff should be fostered. This is the basis for any other achievement in this regard. LOs must be seen as the common thread connecting course catalogues, IQA and EQA in assessment reports. If only one part is missing, recognition will not be able to use LOs.

### **3.6.2 What benefits has the Qrossroads project yielded? Has there been a closer cooperation with the NARIC-ENIC network within Qrossroads/or other projects on mutual recognition?**

#### **What benefits has the Qrossroads project yielded?**

At the time the development of Qrossroads started (2006), ENIC/NARICs, students, employers and HEIs had to search through multiple websites with different formats, information and languages to find information about the results of QA decisions. The Qrossroads project was established by a number of QAAs in order to provide each other with information regarding their procedures and decisions and to provide ENIC/NARICs with information to facilitate their recognition procedures. The Qrossroads database should integrate currently available data and make all the data accessible online, provide a manageable way to automatically update the data under the responsibility of the different accreditation organisations, and serve as an online search engine for other interested parties, particularly ENIC/NARICs, students, employers and HEIs.

While the original goal of Qrossroads, as a central register, has not been fully reached, Qrossroads has helped to create an agreement on key information when publishing QA outcomes and, in some cases, it has led to the implementation of national databases (e.g. in Spain, Denmark, Flanders, Croatia). Qrossroads recently submitted a Request for Proposals to have Qrossroads redesigned into a Google-like system, which would facilitate the search and access to the required information and thus make the database much more user-friendly.

One of the problems indicated by stakeholders with reference to Qrossroads was related to feeding the database with national-level information – so far the database is still only limited. Setting a national register for recognised HE (see also chapter 3.3.3) is feasible, but can indeed be cumbersome and most countries take months, some even years, to get their act together and establish a national database. However, once it has been established, linking it with Qrossroads database takes less than a day. And once this is done, the information can be updated automatically at regular intervals (such as every night).

For the central European register to be complete and up-to date it must however be part of a structure for which there are inherent incentives to want to contribute. That is why one of the recommendations made by the Study's research team is for EQAR to run such a pan-European database, based on information provided by QAAs, with the incentive being a precondition to be registered on EQAR. However, the link to LOs and QFs must also be criteria for EQAR membership (best via the ESG) for such a register to really become a plausible source of information on recognised HE and quality of HEIs and programmes.

#### **Has there been a closer cooperation with the NARIC-ENIC network within Qrossroads/or other projects on mutual recognition?**

The European Consortium for Accreditation has integrated ENIC-NARICs in all of their activities. All of ECA's working groups and its EU-funded projects include representatives from ENIC-NARICs. The knowledge and global network provided by the ENIC-NARIC network are highly valued by ECA and accreditation agencies when dealing with cross-border education (joint programmes, branch campuses, etc.). Currently, ECA and the ENIC-NARIC network are developing the ECAPedia ([www.ecapedia.net](http://www.ecapedia.net)) to publish background information through a Wikipedia-like system. The ECAPedia will be fully functional in the summer of 2013.

## What kind of cooperation/developments would be necessary to help transparency and recognition of degrees?

The Bucharest Communiqué encourages „higher education institutions and quality assurance agencies to assess institutional recognition procedures in internal and external quality assurance". Alike with QFS, success in recognition hinges on the implementation of LOs, as the Communiqué also points out on p.3, “To consolidate the EHEA, meaningful implementation of learning outcomes is needed. The development, understanding and practical use of learning outcomes is crucial to the success of ECTS, the Diploma Supplement, recognition, qualifications frameworks and quality assurance – all of which are interdependent”.

The problem persists that only a few HE systems have easily accessible and transparent information on all recognised HE which includes the information which credential evaluators (ENIC-NARICs, admission officers or employers) need to recognise degrees. If a HE system cannot provide this in a coherent way, it's difficult to come to an agreement on the „automatic” recognition of their degrees. Each HE system should therefore have a fully functional, accessible database that includes all recognised institutions, programmes and the degrees awarded now and in the past (thus with an archive). In order to foster European mobility, this database must be able to be queried by non-nationals. Ideally, information on recognition should be collected in one easy-to-find place online. ENIC-NARICs should therefore be asked to develop a policy on how to come to „automatic” recognition, taking into account the role of QFs and the role of EQAR in establishing such a pan-European register (see also chapters 3.3.5.1 and 3.5.3.).

Institutions, on the other hand, should develop their methodologies to recognise prior learning based on achieved LOs. Having such methodologies will also be important for the recognition of certificates from MOOCs (see 3.8.2). MOOCs currently don't lead to degrees. So if a MOOC graduate wishes to receive formal credits or use MOOC credits (or badges) in a regular programme, they will have to go through an institution. Here, the institutional recognition procedure plays a pivotal role. The increasing importance of these types of recognition procedures, not just for full degrees but also for credits and badges, justifies appropriate QA.

### Recommendations

1. ENIC-NARICs should be asked to develop a policy on how to come to „automatic” recognition, taking into account the role of QFs and the role of EQAR in establishing a pan-European register for recognised HE (institutions, programmes).
2. Institutions should develop methodologies to recognise prior learning based on achieved LOs.

### 3.6.3 Which European quality labels have been successful in cross-border QA?

First quality labels, also known as quality seals, have already been introduced in the 1990ies (e.g. EQUIS) (SURSOCK, SMIDT 2010). From 2006 on there have been several subject related quality label projects, mostly funded by the EC (e.g. AEC, Euro-Inf). They do not focus on quality of HE as such but on LOs of specific study programmes. Most of these labels have been established by professional associations to define a joint set of subject related criteria among the EHEA countries (SH-Interview). There is a huge diversity regarding the focus of the label, the review methods and cycles, and the regional scope (see also Table 1). Although most of the labels emphasise the enhancement part of QA, the majority use accreditation as review method. Among other field specific quality labels introduced, the following ones are prominent and show different aspects of QA labels:

- EQUIS (EFMD Quality Improvement System)<sup>38</sup>: a worldwide Quality Label for business schools, 79 HEIs within the EHEA have been accredited.
- AEC (Association Européenne des Conservatoires, Académies de Musique et Musikhochschulen)<sup>39</sup>: 25 HEIs have been reviewed from 2008 until 2012, thereof two outside of the EHEA. AEC is not

<sup>38</sup> <http://www.efmd.org/index.php/accreditation-main/equis> (last visited on April 27)

focussing on a label but aims at adding a subject-specific dimension to existing QA processes. In co-operations with national QAAs AEC aligns itself with the respective procedures.<sup>40</sup>

- Euro-Inf quality label<sup>41</sup>: Euro-Inf was an EU-financed project from 2006 to 2008. The European Quality Assurance Network for Informatics Education (EQANIE) was founded in 2009 to carry out the accreditations. 69 programmes have been accredited, thereof 52 in Germany and two outside of the EHEA (Bachelors' and Masters' programmes of one HEI counted separated). ASIIN from Germany currently is the only QAA allowed to award the Euro-Inf label.
- Chemistry Quality Eurolabels<sup>42</sup>: Quality labels for Bachelors', Masters' and Doctorate programmes (which is exceptional) are awarded by a network of five agencies from different countries. 106 programmes have been awarded for four years since 2007, thereof 33 from Italy, 15 from Poland, 13 from Germany and 2 from outside of the EHEA.
- EUR-ACE label<sup>43</sup>: The EUR-ACE label for engineering programmes is awarded by the European Network for Engineering Accreditation (ENAE) founded in 2006. Nine agencies from different countries are allowed to carry out the reviews. By the end of 2011, 981 Bachelors' and Masters' programmes were awarded the label for a period of six years. Currently, 30 programmes of the EHEA have been successfully reviewed.

It is remarkable that quality seals are hardly addressed in the QA literature which was analysed for this project although some of them are applied in significant numbers. Table 1 shows an overview of the development and dissemination of major quality labels<sup>44</sup>.

	<b>AEC</b>	<b>EQUIS</b>	<b>EUR-ACE</b>	<b>Euro-Inf</b>	<b>Chemistry Quality Labels</b>
<b>Disciplines</b>	Conservatoires (Music schools)	Business schools	Engineering	Informatics	Chemistry
<b>Executive/ authorized organisations</b>	AEC, partly under auspices of national QAAs	EQUIS	Network of 9 QAAs	ASIIN <sup>45</sup>	Network of 5 QAAs
<b>Type of review</b>	Programme or institutional accreditation	Institutional accreditation <sup>46</sup>	Programme accreditation (Ba/Ma)	Programme accreditation (Ba/Ma)	Programme accreditation (Ba/Ma/PhD)
<b>Review cycle</b>	n.a.	3-5 years	6-8 years	n.a.	4 years
<b>Awarded since</b>	2008	1997	2006	2009	2007
<b>Nr of HEIs / programmes</b>	25 (23) HEIs (thereof 11)	142 (n.a.)	1219 (~1000)	69 (69)	106 (65)

<sup>39</sup> <http://www.aecinfo.org/Content.aspx?id=2324> (last visited on April 27)

<sup>40</sup> <http://www.aec-music.eu/about-aec/services/quality-enhancement> (last visited on May 24)

<sup>41</sup> <http://www.eqanie.eu/pages/quality-label.php> (last visited on April 27)

<sup>42</sup> <http://ectn-assoc.cpe.fr/chemistry-eurolabels/default.htm> (last visited on April 27)

<sup>43</sup> <http://www.enaee.eu/what-is-eur-ace-label> (last visited on April 27)

<sup>44</sup> The data refers to the websites named, lastly reviewed on April 13, 2013

<sup>45</sup> Accreditation Agency for Degree Programmes in Engineering, Informatics, the Natural Sciences and Mathematics e.V. (German QAA)

<sup>46</sup> Including research and PhD programmes

reviewed (in brackets: since 2009)	institutional) <sup>47</sup>				
Nr of countries (in brackets: within EHEA)	13 (11)	39 (19)	19 (15)	9 (7)	20 (19)
Regional focus	Switzerland (6), Poland (4)	UK (24), France (18), China (14), Canada (9), Australia (8)	Germany (399), France (296), Turkey (145), Russia (107), Ireland (94)	Germany (52), Spain (5)	Italy (33), Poland (15), Germany (13)

Table 1: Overview of the development and dissemination of quality labels

**Since 2009 the number of quality label awards has significantly grown. There is no clear tendency regarding countries involved and organisations carrying out the reviews.**

The majority of labels have been introduced between 2006 and 2009 and the number of awarded HEIs and study programmes has therefore significantly grown since 2009. Depending on the discipline, different countries are dominating one label or another, which is especially obvious for Euro-Inf in Germany. AEC is the label with the widest spread among the EHEA in relation to the number of reviews carried out. Although UK and France are the dominating countries of EQUIS in absolute numbers, the EHEA countries shape the minority of countries reviewed against this label. The high number of labels awarded in some countries can be explained by an optional combination of the legal accreditation and the quality label (this is e.g. the case for Germany and Turkey for the EUR-ACE label) (SH-Interview).

**The impact of quality labels and their link to other QA instruments is not clear but they could potentially help to develop QFs**

The number of awards of some quality labels implies that several HEIs are interested in these labels. However, to what extent the established quality labels have led to an improvement in quality is not clear. Although some quality labels are promoted to be useful for employers, stakeholders indicate that they are not demanded by them (SH-Interview). Quality labels have been a development largely independent of the ESG, in particular as regards publishing reports and the involvement of stakeholders and students (ENQA 2012a, p. 5, SH-Interview). ENQA has changed its regulations to enable quality label organisations to get involved into the discussions (without becoming a full member of ENQA). So far however no quality label is involved in ENQA directly<sup>48</sup> (SH-Interview).

It has become evident that quality labels have been a sort of parallel development to the broader QA discussion in the EHEA. There is, however, one area in which there is an evident potential for mutual profit from quality labels, and this is the potential to use the labels' subject-specific descriptors to develop qualification frameworks. So far, this potential seems to have gone largely unused.

**The 'European Alliance for Subject-Specific and Professional Accreditation & Quality Assurance (EASPA)', was founded to provide a collaborative forum for disciplinary/ field-specific European quality assurance networks**

In 2011, a 'European Alliance for Subject-Specific and Professional Accreditation & Quality Assurance' (EASPA) has been founded. This organisation includes several of the previously mentioned quality labels as well as subject-specific networks active in quality assurance and accreditation which are not providing labels. EASPA members have cooperated with QAAs in programme accreditations. While the aims stated at the website<sup>49</sup> are very broad (serving as platform and policy maker, sharing good practices and

<sup>47</sup> Data from June 2012

<sup>48</sup> Many quality seals are carried out by (networks of) QAAs which are member of ENQA.

<sup>49</sup> <http://www.easpa.eu/> (last visited on May 24)

providing training for QA professionals), there have not been corresponding activities yet<sup>50</sup>. Potentially EASPA could become a relevant player in European QA of HE in the future.

### Recommendations

1. Research should be done on the question how far quality labels lead to a higher level of quality of study programmes.
2. Quality Labels should be closer included in the EHEA-wide discussions in general to avoid the development of parallel QA systems without connection among them.
3. Quality labels should be used, where appropriate, to develop subject-specific QFs. EASPA could potentially support this development though this is not part of its mission yet.

### 3.7 WHAT WERE THE DEVELOPMENTS REGARDING THE E4 GROUP?

In the recent years, the E4 organisations have conducted numerous QA-related activities. This chapter will briefly describe the main activities of each actor, as well as joint activities. Joint activities will not be listed in the individual chapters. The aim of this chapter is to show the breadth and diversity of E4 activities, rather than provide a complete overview. The focus will be put on activities since 2009, as well as plans for the near future.

#### 3.7.1 What have been the activities of ENQA?

The European Association for Quality Assurance in Higher Education (ENQA) has been established in 2000. Currently, it comprises 39 full member agencies from 20 countries of the EHEA including two international QAAs. Another four QAAs with a candidate status and 44 affiliate organizations lead to an overall representation of QAAs from 37 countries in ENQA<sup>51</sup>.

Precondition for full ENQA membership is the proof of compliance with part III of the ESG and some additional requirements and guidelines by an external review. However, due to the specific structure of the ESG, agency reviews are not only assessing Part III of the ESG, since according to the first standard of Part III, agencies are required to demonstrate compliance with ESG Part II.

By February 2012, 43 QAAs have been reviewed against the ESG (ENQA 2012a, p. 3). As EQAR does not carry out own reviews, those reviews are also used for membership of EQAR and therefore have a further significance (ENQA 2012a, p. 3).

According to its mission statement<sup>52</sup>, the three main functions of ENQA are to:

- represent its members in political processes and towards other stakeholders,
- act as a think tank for developing further QA processes and systems,
- provide a communication platform for sharing and disseminating information related to QA.

QAAs consider ENQA their policy-making body and voice in the Bologna Process and there seems to be a high degree of satisfaction with its performance in this context. ENQA is following a strategic plan<sup>53</sup> (the current one lasting from 2011 to 2015) and has an annual working plan. Annually, around ten conferences and seminars are offered. Numerous publications are available on the website<sup>54</sup>. Current dominating issues are the link between QA and transparency (tools), joint programmes and the sharing of good practices.

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<sup>50</sup> The single activity published is a recent conference on “Subject-based external Quality Assurance” (on May 21).

<sup>51</sup> <http://www.enqa.eu> (last visited on April 27)

<sup>52</sup> <http://www.enqa.eu/mission.lasso> (last visited on April 27)

<sup>53</sup> <http://www.enqa.eu/files/Strategic%20Plan%202011-2015.pdf> (last visited on April 27)

<sup>54</sup> [http://www.enqa.eu/pubs\\_occasional.lasso](http://www.enqa.eu/pubs_occasional.lasso) and [http://www.enqa.eu/pubs\\_workshop.lasso](http://www.enqa.eu/pubs_workshop.lasso) (last visited on April 27)



In September 2011, ENQA organised a workshop on „Quality assurance of Joint programmes” (ENQA 2012a, p. 5). Within this context, some (non-binding) principles for the future accreditation of Joint Programmes have been developed e.g. a common definition of jointness or the exclusion of national criteria not related to quality (ENQA 2012a, p. 6) (see also chapter 3.8.1).

In 2012, ENQA published its third report „Quality Procedures in the European Higher Education Area and Beyond – Visions for the future”<sup>55</sup>. This report comprises the results of a survey among 28 QAAs from 19 countries and aims at encouraging comparability in external review processes, defining good practice and finding ways for monitoring of study programmes leading to further improvement.

### **ENQA is currently developing joint standards for assessment reports**

In 2012 and 2013 ENQA has been working on the development of joint standards for the format and content of the reports of the various EQA procedures to enhance the transparency function of EQA. Thereby ENQA wants to better delineate the purpose of QA against other transparency tools (ENQA 2012a, pp. 2, 6; Vercruyse, Proteasa 2012, p. 18).

ENQA also supports the development of QAAs in countries not yet having any QAA such as Armenia, Belarus, Georgia and Turkey (ENQA 2012a, p. 2, SH-Interview).

Regarding future development of QAAs, ENQA sees the main priority in changing the relationship between the development of IQA systems to enhance HE and EQA procedures (ENQA 2012a, p. 2, SH-Interview).

### **3.7.2 What have been the activities of EUA in the area of QA?**

The European Universities’ Association (EUA) represents 860 HEI<sup>56</sup>, mostly universities, from all 47<sup>57</sup> member states of the EHEA. EUA supports its members in developing IQA systems by providing tools for capacity building and promote peer-learning among them. Several projects were carried out in this regard such as „Examining Quality Culture in higher education institutions” (EQC) lasting from 2009 to 2012. The objective of this project was to map the existing QA processes and to discuss the relation between formal QA processes and quality culture. The project has led to a list of guiding questions for HEI to reflect on their quality culture (European University Association 2012, p. 8, also see chapter 3.2).

Another important issue for EUA has been the work on transparency tools and rankings including their „unwanted consequences”. In 2009 EUA launched a project to review the methodologies of the main international university rankings and their impact. A first report was published in June 2011<sup>58</sup> (European University Association 2012, p. 8), a second in April 2013.

In October 2010, EUA adopted a revised „Policy Statement on Quality and Quality Assurance in the European Higher Education Area”<sup>59</sup> as guiding paper. It emphasizes the responsibility of HEIs for quality of HE and promotes the role of both internal and external QA to facilitate and develop a quality culture rather than measuring quality by quantitative indicators (SH-Interview).

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<sup>55</sup> [http://www.enqa.eu/files/ENQA\\_op18.pdf](http://www.enqa.eu/files/ENQA_op18.pdf) (last visited on April 27)

<sup>56</sup> <http://www.eua.be/eua-membership-and-services/Home/members-directory.aspx> (last visited on April 27)

<sup>57</sup> <http://www.eua.be/about/at-a-glance.aspx> (last visited on April 27)

<sup>58</sup> RAUHVARGERS (2011): Global University Rankings and their Impact

<sup>59</sup> [http://www.eua.be/Libraries/Publications\\_homepage\\_list/EUA-QA-Policy-2010.sflb.ashx](http://www.eua.be/Libraries/Publications_homepage_list/EUA-QA-Policy-2010.sflb.ashx) (last visited on April 27)

### **EUA is carrying out projects on improving IQA and on developing a quality culture.**

Currently EUA runs two projects on improving IQA at HEI: „Promoting Quality Culture” (PQC) is carried out together with ENQA aiming not only at training HEIs but also helping QAAs to improve their support for the development of quality culture in the HEIs. A current TEMPUS-project is named EUREQA (Empowering Universities to fulfil their responsibility for QA) and involving HEIs from the EU and the Western Balkans to empower them to enhance their internal QA activities (SH-Interview).

The „Institutional Evaluation Programme” (IEP), which has been run by EUA for almost twenty years, has been listed on EQAR in 2011<sup>60</sup> and its ENQA membership was re-confirmed in 2009 (SH-Interview).

EUA is also active outside the EHEA: The „Europe-Africa Quality Connect” project includes a dialogue on QA processes in Europe and Africa, as well as HEIs evaluations along the lines of IEP (European University Association 2012, p. 11). „ALFA-Puentes project” is focusing the Andean region (SH-Interview).

### **3.7.3 What have been the activities of ESU in the area of QA?**

The European Students' Union (ESU) is the umbrella organisation of 47 National Unions of Students (NUS) from 39 countries and thereby representing about 11 million of students<sup>61</sup>.

In 2010, ESU has launched the QUEST project (QUEST for quality for students' project) to identify students' genuine perception of what HE quality is from a pan-European perspective and to pinpoint what information is seen as important to be provided to them from the side of the HEIs. The main aim of ESU's QUEST project is to change the perspective of QA systems to the views of students as the main benefactors. The project will be concluded in 2013 (Gavra 2012, p. 1). The QUEST project is conducted in co-operation with other organisations (ARACIS, Romanian QAA; SPARQS, Scottish national development agency on student involvement in QA; fzs, German NUS) (Gavra 2012, pp. 2-3).

#### **Since 2009 ESU has developed a student experts' pool covering 28 countries of the EHEA**

In 2009, ESU has established its Students' Experts Pool on QA to promote and develop student participation in QA in Europe. As of April 2013, there are more than 60 students from 28 countries in this pool<sup>62</sup>. The pool members contribute to ESU policymaking process, act as multipliers agents in their respective countries, collaborate in several projects and participate in QA reviews. Among others, the pool co-operates with ENQA, IEP and National Students' Pools). There are six national pools run by student unions (Gavra 2012, p. 17). In some cases the establishment of these national pools have been a direct consequence of students participating in the ESU's pool. The national pools, in most of the cases, aim to disseminate information among students at the local level and its representatives (SH-Interview).

Another noteworthy activity of ESU is the publication „Bologna with Student Eyes” referring to the Progress reports. It has been published in 2009 and 2012 and among others contains a survey on the level of student involvement in QA across Europe and the student view on tools as rankings and EQAR from the perspective of NUSes.

Moreover, ESU is involved, as project partner, in several QA projects at European and national level. For instance, ESU nominees participate in the structures or bodies of different QAAs, for example in the steering committee of IEP, the advisory board of ANVUR, the Italian QA agency and the selection committee of ARACIS, the Romanian QA agency. ESU has also submitted an application (LLP) to create

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<sup>60</sup> [http://www.eua.be/news/12-01-05/EUA s Institutional Evaluation Programme IEP admitted to European Quality Assurance Register for Higher Education EQAR.aspx](http://www.eua.be/news/12-01-05/EUA_s_Institutional_Evaluation_Programme_IEP_admitted_to_European_Quality_Assurance_Register_for_Higher_Education_EQAR.aspx) (last visited on April 27)

<sup>61</sup> <http://www.esu-online.org/about/aboutus/> (last visited on April 27)

<sup>62</sup> <http://www.esu-online.org/structures/qapool/> (last visited on April 27)



a quality label for student centred learning and has already developed some indicators for that (SH-Interview).

### **3.7.4 What have been the activities of EURASHE in the area of QA?**

The European Association of Higher Education Institutions (EURASHE) represents more than 1,400 HEIs from 40 countries within and outside the EHEA that offer professionally oriented study programmes<sup>63</sup>.

In 2010, EURASHE has published its „10 Commitments for the European Higher Education Area in 2020” calling for a more verifiable implementation of the Bologna action lines by setting clear objectives and acknowledging that the progress strongly depends on the willingness of the actors involved (EURASHE 2010, pp. 1–2). EURASHE encourages its members „to respond proactively to the agreed reforms within the professional sector” (EURASHE 2012, p. 3).

#### **EURASHE addresses short cycle degrees and the link between QA and transparency tools**

A recent important QA related publication is the „Policy Paper on Quality Assurance and Transparency Tools”<sup>64</sup>, published in October 2012 (SH-Interview). It is addressing the need for accountability of HEIs while involving staff and students to internally improve the quality of HE. Regarding the capacity building of its members, EURASHE holds annual seminars as on the „Implementation of Internal and External Quality Assurance” on 27-28 September 2012 in Nicosia, Cyprus. Another seminar with the same title is scheduled for autumn 2013 (SH-Interview).

Between November 2009 and October 2010 EURASHE carried out the „Level 5 the Missing Link” project on short cycle degrees (see chapter 3.8.3). Further, EURASHE was involved in the Tempus project „Centres for Quality Assurance and Accreditation in Central Asia” (CANQA)<sup>65</sup>, lasting from 2009 to 2011.

Under the LLP 2013, EURASHE has applied for a project on QA quality seals in several disciplines, in an attempt to survey existing initiatives in cross-border QA, and to look at the generic features of subject-specific QA indicators. This has been done in cooperation with sectoral associations (from Arts, Music, Business Studies, and Nursing). Depending on the outcome of this project application, EURASHE intends to pursue this work in the coming years (SH-Interview).

### **3.7.5 Is the distinction of roles between ENQA, EQAR and ECA clear?**

#### **ENQA, ECA and EQAR are reflecting the needs of the time when they were founded**

To understand the different roles of ENQA, EQAR and ECA it is helpful to look at the chronological order of their foundation: ENQA was founded in 2000 by QAAs as membership organisation to create a platform for mutual discussion and to represent the interests of QAAs (see chapter 3.7.1). When ECA was founded in 2003, the goal was mutual recognition of accreditation decisions, mainly because it was impossible to merge existing agencies, as some governments tried between 2001 and 2003. According to another account, founding of ECA was also a reaction to the rejection of accreditation procedures by a majority of ENQA members at this time (SH-Interview). Since then, there have been many overlapping activities of both ENQA and ECA regarding mutual learning and dissemination of information. At the same time, it has been undisputed that ENQA had a policy making role, while ECA was the place for internal discussion of QAAs, project development and pioneering activities (SH-Interview).

EQAR was founded in 2008, by the E4 Group (including ENQA), as an independent organisation to „manage a Register of legitimate and credible quality assurance agencies operating in Europe” (EQAR

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<sup>63</sup><http://eurashe.eu/about-eurashe/> (last visited on April 27)

<sup>64</sup>[http://www.eurashe.eu/wp-content/uploads/2012/10/EURASHE\\_Policy\\_Paper\\_QA\\_TT\\_Oct2012.pdf](http://www.eurashe.eu/wp-content/uploads/2012/10/EURASHE_Policy_Paper_QA_TT_Oct2012.pdf) (last visited on April 27)

<sup>65</sup>[http://www.canqa.net/index.php?option=com\\_content&view=article&id=6&Itemid=30&lang=en](http://www.canqa.net/index.php?option=com_content&view=article&id=6&Itemid=30&lang=en) (last visited on April 27)

2010, p. 49) (see chapter 3.4). Independence means that no particular stakeholder group has a dominant influence, although stakeholders and governments are (co-)governing EQAR (Tück 2012a, p. 6). While ENQA sees itself as a „major driving force” for QA development (ENQA 2011, pp. 9–10) and is an umbrella organisation for QAAs, EQAR’s main mission is to provide authoritative information on reliable QAAs (that have proven to comply substantially with the ESG), as well as to enhance transparency, trust and international recognition of EQA (see chapter 3.4). EQAR does not intend to become a platform for mutual learning although some QAAs requested this (Tück 2012a, p. 34).

Up to this point, the distinction of roles seems quite clear, beside some non-disturbing overlaps. The self-declared missions and purposes are shown in the table below.

	<b>EQAR</b>	<b>ENQA</b>	<b>ECA</b>
Founded in	2008	2000	2003
Founded/steered by	E4 <sup>66</sup> /social partners	QAAs	QAAs
Purpose/mission statement	<ul style="list-style-type: none"> <li>• Managing a Register of credible QAAs</li> <li>• Provision of information on European QA</li> <li>• Facilitation of mutual acceptance of QA decisions and enhancement of trust</li> <li>• Reduction of „accreditation mills”<sup>67</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Representation of members in political processes and towards other stakeholders</li> <li>• think tank for developing further QA processes and systems</li> <li>• communication platform for sharing and disseminating information<sup>68</sup></li> </ul>	<ul style="list-style-type: none"> <li>• primary aim: mutual recognition of accreditation decisions</li> <li>• mutual learning and disseminating best practices in accreditation</li> <li>• providing transparent information on quality and supporting internationalisation of institutions and students<sup>69</sup></li> </ul>
Addressed audience	All stakeholders and the public	QAAs, Ministers, other stakeholders	QAAs, ENIC-NARICs, the public

**Table 2: Mission Statements and aims of EQAR, ENQA and ECA**

<sup>66</sup>Mandated by the EHEA member states.

<sup>67</sup>Mission Statement of EQAR (<http://www.egar.eu/about/mission-statement.html>, last visited on April 27)

<sup>68</sup> Mission Statement of ENQA (<http://www.enqa.eu/mission.lasso>, last visited on April 27)

<sup>69</sup> Aims of ECA (<http://www.eaconsortium.net/index.php>, last visited on April 27)

## **ECA has been active in developing and sharing good practices**

ECA has contributed to a large number of QA principles and tools during the last decade. These include:

- A code of good practice (2004, prior to the ESG)
- Principles for the selection of experts (2005)
- A joint Declaration concerning the Automatic Recognition of Qualifications, which has been signed by ENIC-NARIC of ECA member countries (2005)
- Principles for accreditation procedures regarding joint programmes (2007)
- Bilateral mutual recognition of accreditation agreements (2007)
- Qrossroads.eu (2008)
- Principles regarding learning outcomes in accreditation procedures (2009)
- Recommendations for mutual recognition of institutional evaluations (2010)
- Multilateral agreement regarding joint programmes (2011)
- Handbook for the training of panel members for external QA procedures (2012) & Training Portal (2012)
- Guidelines for Good Practice for Awarding Joint Degrees (2013).

As can be seen from the above list, ECA has developed a number of on-the-ground agency procedures and joint quality standards, with a focus on joint programmes. Furthermore, ECA members in MULTRA<sup>70</sup> automatically recognise each others' accreditation results regarding joint programmes since 2011. Also, ECA is expanding its cooperation to include a non-EHEA perspective (Columbia).

## **Recommendations by the external Expert Panel, that evaluated EQAR in 2011, included strengthening EQAR's strategic role and clarifying the decision process of EQAR and ENQA**

The key recommendation by the External Panel that evaluated EQAR in 2011, was to strengthen EQAR's strategic role in the development of HE in Europe and in particular, to agree on its strategic priorities and incorporate them into a strategic plan (David, et al. 2011b). The latter has already been achieved, with EQAR's Strategic Plan for the years 2013-2017 adopted by the General Assembly in March 2013. The more strategic role of EQAR, was not intended to duplicate ENQA's mission or activities (Tück 2012b, pp. 1–2), but to help to increase EQAR's credibility and capability (David, et al. 2011, pp. 7–8). In particular, EQAR stated that its „*regulatory role*’ and *strategic role*’ are not separate, but two sides of the same coin, both of them being assumed under the same mission and objectives” – to be a broadly governed Register. Still ENQA, one of the founders of EQAR, is not in favour of enhancing EQAR's strategic (e.g. policy level) role. For more information, see chapter 3.4.

Moreover, what remains difficult to explain, especially to the public, is that the same reviews of QAAs may lead to different conclusions regarding ENQA membership on the one hand and EQAR listing on the other one (Westerheijden et al. 2010b, p. 34). Even though in practice it has so far only happened in three cases – see chapter 3.4.2.2. The differences result from different approaches to compliance and lack of clear guidance. ENQA and EQAR each use the ESG for their specific purposes and in the context of their unique mission and thus might come to different conclusions. While EQAR is a Register of credible QAAs and its decisions reflect a „snapshot” of agencies at a given time (compliance oriented approach), ENQA is a membership organisation of QAAs, representing their interests and helping them to improve and enhance their operations (develop capacity) and cooperation (development oriented approach) (Tück 2012b, pp. 26–27; ENQA 2011, p. 10). Bearing that in mind, there is still a strong need to clarify the decision process of EQAR and ENQA. Hence, EQAR has announced to invite ENQA to intensify the dialogue „to discuss each other's requirements for organisational eligibility and the reasons for possible differences” (Tück 2012b, pp. 9–10). Up till now, there has not been any clarification in this regard (SH-Interviews), however there is a continuous dialogue between the two organisations. For more information, see chapter 3.4.2.2. Some stakeholders suggest that ENQA, in its function as a policy

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<sup>70</sup> Multilateral Agreement on the Mutual Recognition of Accreditation Results regarding Joint Programmes

organisation, should only focus on checking agencies' compliance with the ESG part III. The added hurdle of having to comply with part II and part III could be a possible differentiating characteristic between ENQA and EQAR.

### **Recommendations**

1. The 3 organisations concerned about the development of European EQA should continue and strengthen their cooperation and dialogue.
2. ENQA and EQAR should clarify the potential for their different interpretations of „substantial compliance” with the ESG to the public, as well as provide a more transparent definition of this requirement.
3. EQAR should set itself apart from ENQA. A possibility would be for ENQA to focus on part III of the ESG and be more inclusive as an umbrella organisation for QAAs. EQAR could then focus more on part II of the ESG and add further requirements regarding quality of education. This would be more in line with its nature as a quality assuring register.
4. ECA should reflect its future perspectives and re-define its role (beside of ENQA), possibly in developing and pioneering new procedures and new forms of cooperation to stay a relevant player in the European QA environment.

### **3.7.6 Which QA related joint activities of E4 organisations have there been?**

Major, QA related, joint activities of the E4 have so far included:

- The development of the ESG in 2005 and its current revision. This covers the completion of the MAP-ESG project from 2010 to 2012 and a broad embedded stakeholder consultation,
- The implementation of EQAR in 2008 and its further development (see chapter 3.4),
- The implementation and steering of EQAF.

The annual „European Quality Assurance Forum” (EQAF) has developed to be an important platform for all stakeholders involved in QA in Europe and beyond, bringing together more than 400 experts to discuss main developments and trends in QA (European University Association 2012, p. 8). The EQAF took place in Copenhagen (2009), Lyon (2010), Antwerp (2011) and Tallinn (2012).

#### **Despite slightly different aims, the affinity between the E4 has grown**

Joint activities of E4 have facilitated a growing internationalisation of the EQA review panels, as well as ensured student participation in QA and further professionalization of QAAs, to name but a few (SURSOCK, SMIDT 2010). EURASHE states that QA „has been the domain where the cooperation of the Bologna Process stakeholders has proven to be most effective” (EURASHE 2012, p. 8). The affinity of the E4 has grown during the last years, with the current ESG revision being a good reflection of this trend (SH-Interview). However, the goals of the various actors in the field of QA remain slightly different (Bartolo 2010, p. 50). This can be summarised as follows:

- EUA puts emphasis on the HEIs' level to be at the core of any QA activity, which should always be enhancement-led and support the development of a quality culture.
- EURASHE, putting the focus little more on the programme level, basically agrees on that but sees further importance in employability and thus in the link between QA and QFs.
- ESU's main priority is the comparability of study programmes, linked to accountability of HEIs and employability across the EHEA.
- ENQA naturally stays in the middle of these expectations and tries to meet them (SH-Interview).

Generally it can be stated, that the E4 are intensively and widely connected and the majority of projects and activities in the area of QA are conducted by more than one actor. The breadth and diversity of projects reflect the general developments regarding the QA action line and other relating issues. The E4 is an important player actively bringing forward the Bologna Process.

The most important development in the past few years, is that – via joint activities – the E4 organisations have learned to work together despite and with their differences. Of course, there are some tensions between the E4s (and in particular the position of EUA might be considered complicated since, through IEP, it is a member of ENQA) and they do express different opinions on a wide-array of QA topics, still they have found a cooperative way to accommodate each other in their own activities, giving the floor to other partners to express dissenting opinions.

Nonetheless, there are still areas where the cooperation of E4 should be strengthened and more focused on. Particularly, in terms of achieving greater consistency of application of the Standards and Guidelines, the MAP-ESG project consultations showed a strong stakeholder desire for developmental activities, along the lines of exchange of information, sharing good practice, further training workshops etc (ENQA 2011, p. 30).

### **Recommendations**

1. The E4 joint activities in the QA action line have shown to be strong and effective. Therefore they should be further supported. Moreover, they can serve as a cooperation model for other action lines and the integrative approach to implementation of the Bologna Process goals on all levels.
2. The challenge for the future remains for the E4 to develop and implement a joint action plan, targeted to contribute to the achievement of the Bologna goals and commitments regarding QA. In particular, how to improve the consistency of ESG implementation and their awareness on all levels.
3. A regular cooperation and dialogue between the E4 and European Commission should be established.

## **3.8 WHAT WERE THE OTHER DEVELOPMENTS IN QA IN EUROPEAN HE?**

### **3.8.1 What were the developments in QA of cross-border education?**

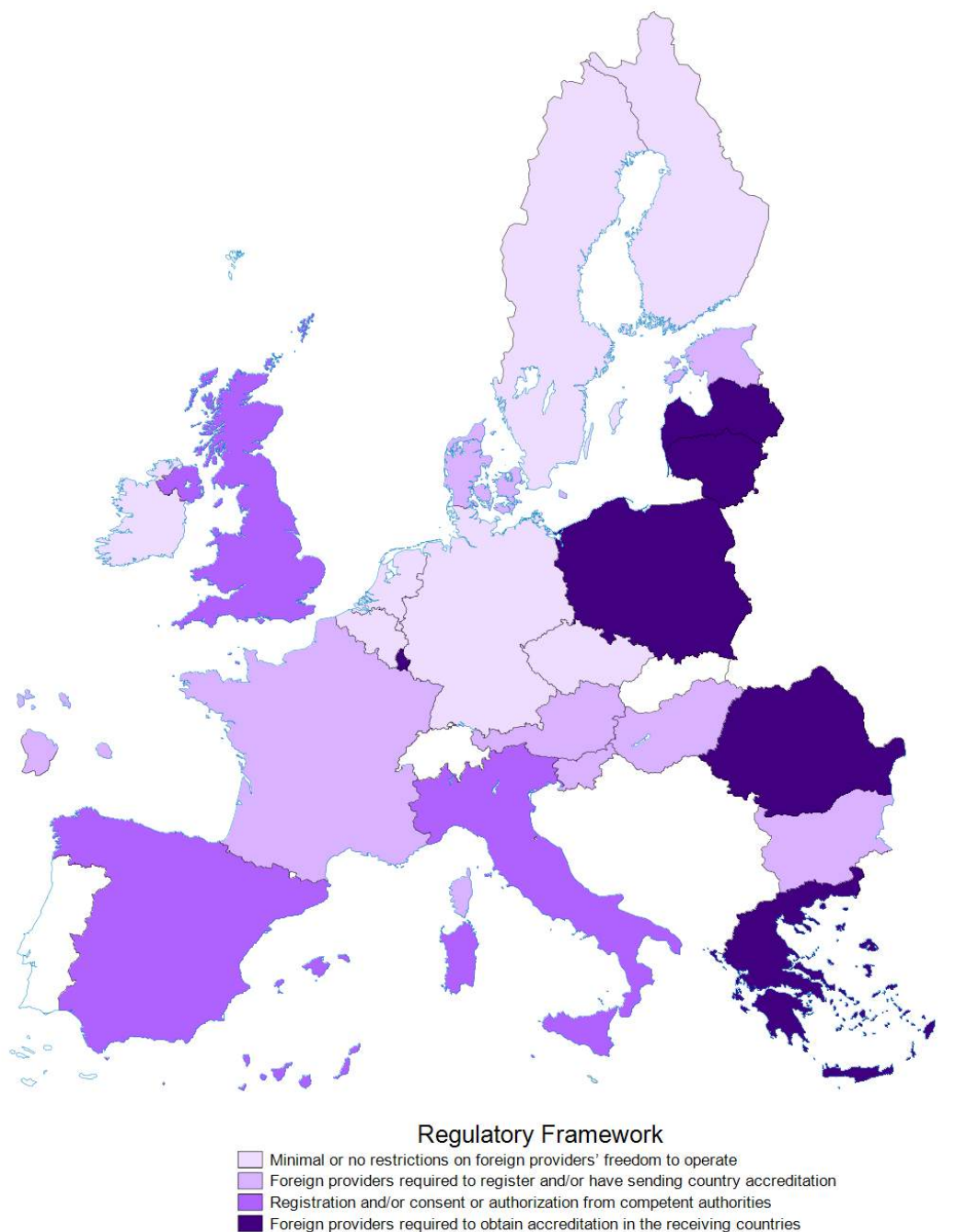
#### **Franchising, validation and branch campuses**

A study on the provision of franchising, validation and branch campuses in HE across borders in the EU was conducted on behalf of the European Commission by a same consortium preparing the present document. The study identified 253 such activities and shows and that, compared with other world regions, franchising, validation and branch campuses in Europe as a whole is in its infancy. The study has also shown that there is notably little publicly available information on the accreditation status on the receiving institutions<sup>71</sup> websites and almost none on the degree-granting exporting institutions' provisions for QA. The regulation of franchising, validation and branch campuses in Europe is also highly diverse and goes from minimal or no restrictions on foreign providers' freedom to operate to foreign providers being required to obtain an additional accreditation in the receiving countries to set up shop<sup>72</sup>.

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<sup>71</sup> the institution where the programme is carried out

<sup>72</sup> Counter intuitively, the relationship between the level of regulation and the amount of CBHE activity in receiving countries appears to be weak



**Figure 9: Regulatory classification of EU Member States**

The study also shows that whilst two thirds of Member States have some form of regulation in respect of receiving cross-border higher education (CBHE), most of them rely substantially upon the accreditation processes of exporting countries. Indeed, there is a striking contrast between regulation of incoming CBHE and exported CBHE, with, on the whole, very little regulation by Member States of their HEIs' activities beyond their own borders. This is notable in itself, but especially interesting in light of the case law of the European Court of Justice, which has ruled that the exporting Member State is responsible for the organisation and evaluation of the courses and degrees granted by their HEIs, including those delivered in another Member State. In this regard, while prior to the scandal around the University of Wales, UK's QAA was criticised for its lenient stance towards CBHE, its current approach to auditing the exports of UK providers is a good practice.

In general, Member States have rather limited awareness of the exporting as well as received franchised and validated programmes and branch campuses offered in their countries. Also, since most countries rely upon the accreditation procedures of others, it is clear without transparency tools for registration or accreditation major variations in quality – and loopholes for rogue providers to exploit - are do exist<sup>73</sup>. The study has shown that there is a need for a European-wide agreement for every Member State to monitor the programmes and branch campuses its HEIs export to other countries, as well as an obligation for incoming programmes and branch campuses to be included into a national register. This register should be linked to the European database for accredited programmes and institutions, which has been recommended in chapter 3.3.5. For the purpose of CBHE, the register should naturally also contain information on programmes exported from an EHEA country to any country outside the EHEA.

### **Joint Programmes**

European QAAs have analysed the issues of QA in joint programmes in a number of projects, the most notable being Transnational European Evaluation Projects I and II (TEEP I and II) by ENQA and the Joint Master's Programmes – Joint Evaluations: A Nordic Challenge by the Nordic Quality Assurance Network (ENQA 2012b, p. 5). Most countries have developed forms of cooperative QA forms for the accreditation of Joint Programmes. However, much still remains to be done in this area. The main challenge lies in the differences between national systems and legal frameworks regarding the approval of programmes (ENQA 2012b, p. 5). On one hand, in principle, part II of the ESG is applicable to accreditation of Joint programmes and still, national specificities in the application of the ESG constitute differences in the process design (ENQA 2012a, p. 5). On the other hand, there is clear evidence that those national regulations, which do not refer to the quality of programmes, but to formal issues such as the denomination of degrees, workload, semester periods, staff requirements, etc. are a much bigger obstacle for implementing Joint programmes than the accreditation or external QA as such. Hence, more flexibility regarding formal not quality related criteria for Joint programmes is paramount – and these national formal specifications are out of the remit of the QAA (ENQA 2012a, p. 6). Formal national criteria thus pose the most important obstacle to implementing Joint programmes.

„Traditional“ QA according to the ESG is not adequate for cross-border education since it does not have provisions in place for joint programmes with partners with different, and often contradictory, national criteria for QA. Partner institutions for cross-border activities are therefore sometimes chosen based on the ease of accreditation in both seat countries.

ENQA therefore recommended to ministers responsible for HE in the EHEA, to allow for a specific European accreditation approach for Joint programmes which should be applied to all Joint programmes that are subject to compulsory programme accreditation at national level (ENQA 2012a, p. 8), thus exempting such programmes from formal national requirements. Additional national criteria should only be applied if they are related to the quality of the programme. This means that joint programmes that have been accredited with the European approach would not need to be accredited for a second time at national level (ENQA 2012a, p. 6). The ministers plan to recognise this decision (SH-Interview), as declared in the 2012 Bucharest Communiqué.

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<sup>73</sup> There are currently a number of institutions known to the authors, which do not have recognition as legitimate providers of HE by any European Member State, but which operate branch campuses in a large number of other countries, claiming to be a “Swiss” or “Belgian” university, thus leading students to believe them to be legitimate. Often, such institutions only maintain a legal presence in their exporting country, relying exclusively on their “branches” to operate. There is at least one case where such a provider is even known to have offered to “validate” programmes of third providers in another country, thus granting it the right to award – non-recognised – academic degrees.



## Recommendations

1. The Accreditation of joint programmes should be reduced to a single procedure with effect in all national jurisdictions concerned to minimize the bureaucratic burden.
2. Such an accreditation approach would need to contain a commonly accepted definition of a Joint programme as well as a specific set of criteria for accreditation based on the proper application of the Qualifications Framework of the EHEA, ECTS, DS and IQA in accordance with part I of the ESG. In addition, criteria regarding the specific nature of Joint programmes, namely joint responsibility, joint development and joint provision of the programme would need to be applied.
3. Additional national criteria should – if at all - only be applied if they are related to the quality of the programme. Formal national criteria are the most important obstacle to implementing Joint programmes and should therefore not be applied.

### 3.8.2 What were the developments in QA of MOOCs, distance education?

The emerging issue of massive open online courses (MOOCs), openly accessible, free-of-charge, large-scale interactive courses delivered via the internet, is currently one of the most-discussed trend in international HE. MOOCs are however not yet regarded as courses or programmes leading to degrees. In the United States, the first legislations are experimenting with including these courses into the formal education system<sup>74</sup>. Some universities are already trying to award credits to students who have completed certain certified courses<sup>75</sup>. If this evolves past its experimental phase, issues for QA will, next to the content quality of these courses, be identity verification and student assessment. Until now, MOOCs have not been an issue for QAAs in Europe. Once they do, they will most likely be treated as a form of distance education, which, in principle, is not treated differently than 'traditional' forms of education.

A possible consequence of widely available, free-to-access quality HE could be the differentiation of the HE process into separate channels for the delivery of content (e.g. through MOOCs) and the assessment of achieved LOs. It is in this area that the issue of MOOCs and the discussions on recognition of prior learning and the inclusion of non-formal and informal learning into the framework of the formal education system converge (see 3.6.1). CHE Consult and the Bertelsmann foundation are currently working on a study analysing the potential risks and benefits of MOOCs for HE, which will be published in late 2013.

### 3.8.3 What were the developments in QA of short-cycle courses?

QA of short-cycle courses (SCHE) is somewhat of a fringe topic in HE (SH-Interview). Short Cycle HE is usually education at the EQF level 5. In some countries SCHE is part of HE but not in others. In some countries (e.g. Slovenia) SCHE is not part of formal education at all. Providers of SCHE can be universities, upper secondary institutions in cooperation with a university or a whole host of different types of institutions. Research on SCHE is scarce. EURASHE has conducted one study on Short Cycle HE in Europe in 2011 but little more systematic research has been done on the issue (Kirsch, Beernaert 2011). In all countries (except Turkey) there is already some form of EQA covering such provision (Kirsch, Beernaert 2011, p. 64). QA of short-cycle degrees is highly heterogeneous within Europe. In ten countries QA is carried out by a national QAA (BENl, DK, HU, IE, LV, NL, NO, SI, UKENIW, UKSC). In five countries QA is carried out by a national agency assisted by international experts (CY, IS, NL, LU, PT) and in one country (ES) by a professional body or another QAA. Also in Malta QA is carried out by an

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<sup>74</sup> <http://www.insidehighered.com/news/2013/03/14/california-educational-factions-eye-plan-offer-mooc-credit-public-colleges> (last visited on April 27)

<sup>75</sup> <http://chronicle.com/blogs/wiredcampus/california-state-u-system-will-expand-mooc-experiment/43361> (last visited on April 27)

independent body but it was not defined which one. In three countries QA is still carried out by the ministry of education (BEfr, CZ, FR) (Kirsch, Beernaert 2011). Also, in several countries the external QAAs are very often not yet independent as defined in the ESG (Kirsch, Beernaert 2011, p. 64). However, some observers see a tendency to give regular QAAs competency over the short cycle.

### **3.8.4 What were the other EHEA-wide initiatives related to QA? Overview of the role of rankings in QA and transparency**

In the last few years, transparency of HE has become one of the priority areas of the EHEA. The Bologna action lines, including QA, QFs and recognition, as well as tools for their implementation, such as the ECTS, the Diploma Supplement and the Lisbon Recognition Convention, have significantly contributed to making the diversity of European HE more transparent and comparable. The BFUG Working Group on Structural Reforms (established by the Bologna Follow-up Group as part of the 2012-2015 work plan), aimed at improving the coherence and implementation of EHEA structural reforms, takes transparency into consideration as one of the 4 elements of those reforms, alongside QA, QFs and recognition.

Simultaneously to those developments, the number of HEIs' rankings, league tables and other classification tools has increased substantially<sup>76</sup>. While national rankings are used in only 9 countries (Päll 2012, p. 119), international rankings play a large role for HEIs and policymakers. Not to mention, they usually attract a lot of publicity. The advent of U-Multirank, a new international university ranking, has been one of the most important developments in the discussion on the use and usefulness of classification tools.

U-Multirank is based on the user-driven approach of the German CHE Ranking and examines institutions' performance across a wide range of HE missions. Its first results, for 500 institutions, will be published in 2014. It is different from other rankings such as Times, QS or Shanghai in that it compares the performance of universities and colleges not only in research, but also in teaching, knowledge transfer, international orientation and regional engagement. It also provides performance profiles at the level of the institution as a whole, as well as at the level of different disciplinary fields (initially mechanical and electrical engineering, business and physics). The information collected is not compounded into league tables but gathered and presented in a way that enables users to specify the type of institutions, as well as the area of performance they wish to compare. In other words, it will and should not be a traditional ranking, but rather an information tool, that can be used by students and other stakeholders to acquire and compare universities' strengths and profiles, to show the diversity and different strands of European HEIs (SH-Interview).

Generally, rankings and classification tools have been seen as controversial by NUS (Päll 2012, p. 130-131), as well as many other stakeholders and HEIs. While among most stakeholders there is now an increasingly nuanced view towards rankings, and U-Multirank in particular there remains an argument about the limits of their utility. A commonly voiced reservation, shared by stakeholders, is that rankings should have no role in QA frameworks, nor in the ESG. From a QA perspective, having a tool relying only on quantitative indicators cannot tell HEIs how to improve their standing, not to mention their quality. Transparency tools based on comprehensive EQA reviews, taking into account the perspectives of different stakeholders and providing a non-simplistic view of HEIs and programmes, are also favoured by EQAR (EQAR 2010, p. 49). In practical terms, the difficulty of data collection, the question of data reliability, the costs and doubts about financial sustainability (arguments commonly raised with regard to rankings in general), makes some stakeholders sceptical of U-Multirank's long-term success (SH-Interview). On the other hand, a positive effect is expected from raising the awareness of necessity of collecting and analysing data. This might help EHEA by finding common terminology, definitions and indicators for various questions (SH-Interview).

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<sup>76</sup><http://www.eua.be/eua-work-and-policy-area/quality-assurance/transparency-and-rankings-activities.aspx>, checked on 28/05/2013.

HEIs are naturally concerned that performance, as judged by the classification tool, could become the basis for future funding decisions. Also, some profiteers of the current situation, such as a number of British universities or the LERU network, are concerned that they may not keep their top positions in some rankings (areas) in U-Multirank and are therefore considering not to take part in this initiative. The true impact of U-Multirank will only show once it is up and running. As of early 2013, the number of registrations has already surpassed the initial goal of 500 HEIs, showing a high degree of interest and openness towards the project.

### **3.8.5 Has there been cooperation on QA between EHEA and other regions**

Some agencies already have successfully used the ESG as review criteria outside of the EHEA, for instance in China and other Asian countries, in particular in relation with joint programmes (ENQA 2011, p. 21 SH-Interview). However it is not clear whether the ESG are actually able to be transferred properly. QAAs promote themselves to be listed in the EQAR but the register so far has no means to control what QAAs listed are actually doing outside the EHEA. EQAR should therefore be given means to monitor the activities of listed QAAs outside of the EHEA. Some further international and world-wide co-operations are listed in the chapter on activities of the E4 (see chapter 3.7).

The ministers have called for stronger QA cooperation with other regions by using existing networks and by including more QAAs from outside of the EHEA in the EQAR (BFUG Working Group "Mobility for Better Learning" 2012, p. 4). Some stakeholders see a lack of initiatives to open up to other European systems. There is a growing cooperation among universities on the international sphere, but there is no forum to compare QA systems on an international scale (SH-Interview).

There are also a number of TEMPUS projects dealing with QA in neighbouring regions (e.g. CANCA in Central Asia<sup>77</sup>), regional integration initiatives (e.g. Alfapuentes<sup>78</sup> in South America) or cooperation on specific issues in other regions (e.g. The African Higher Education Harmonisation and Tuning initiative<sup>79</sup>). ECA's JOQAR project has partners from Australia, India, Colombia and New Zealand.

## **3.9 SUMMARY - TRENDS, ACHIEVEMENTS AND RECOMMENDATIONS REGARDING QA IN THE EHEA**

The present Study aimed to identify progress in the development of QA systems in the EHEA, current trends, achievements, good practices, weaknesses and future challenges to European QA systems and cooperation. To this end, a large body of literature was analysed and six formal stakeholder interviews were conducted. In addition, information and perspectives from a large number of informal conversations with contacts in the QA community enriched the report.

In summary, the Study's research team can say with confidence that QA systems are developing within the EHEA. It becomes clear that there are a number of trends relevant to both IQA and EQA.

The overarching trend of the last years seems to be a growing awareness that all areas of HE are connected and that QA can and must not be regarded separately from the teaching & learning activities, services and administrative processes within HEIs, but must be designed in such a way to enhance synergies between them. In policy terms, this means that the different action lines within the Bologna process must be even further integrated. Respectively, the missing link between QA and the other Bologna tools is increasingly seen as problematic for the ESG. Stakeholders are aware of this importance and are currently revising the ESG to address this issue.

### **The realisation of interconnectedness is driving progress in IQA systems**

IQA structures and processes are now largely in place and take into account aspects of the ESG, although the degree of compliance varies significantly across EHEA countries, as well as within national

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<sup>77</sup> [www.canqa.net](http://www.canqa.net) (last visited on April 27)

<sup>78</sup> <http://alfapuentes.org/> (last visited on April 27)

<sup>79</sup> [http://europa.eu/rapid/press-release MEMO-13-367 en.htm](http://europa.eu/rapid/press-release_MEMO-13-367_en.htm) (last visited on April 27)

HE systems. Some elements of European QA, such as student participation, are increasingly taken for granted within HEIs, and the role of external stakeholders is increasing, even though their systematic and meaningful engagement remains challenging.

The biggest challenge has not changed since 2009 and is still how to ensure that IQA encourages development of a strong quality culture and improves quality of HE provision. QA is still often regarded more as a top-down and administrative task rather than the heart of the matter for academics. The concept of quality culture is highly relevant if IQA is to overcome this barrier. Indeed, there is a growing realisation among QA practitioners that QA systems need to be developed taking current academic practice as point of departure and then involving academics to answer the fundamental QA questions „what are we trying to do? – how are we doing it? – how do we know that it works? – how do we change to improve?”. Only through such a participative process, involving all stakeholders, will QA processes not become administrative, with little impact on academic practice, as QA systems are often criticized to be. The need to design curricula from a student perspective with LOs as the point of departure is an excellent basis for such a process. Most HEIs managed to define LOs for their programmes but implementing this new approach into the teaching and learning process and aligning it with IQA systems remains a great challenge. To solve this challenge, academics have to be trained and organisational development projects have to be carried out in order to reach a deep level of implementation. Unfortunately, funding is often not available for such large scale projects.

The second component in addition to involving academics is building institutional capacity to systematically close the feedback loops and „remind” academics to follow through with their QA processes, as well as to publish objective information on HEI performance. In this regard, IQA systems have become more systematised and consistent in the past few years. The ESG, while they may have not yet become the single „common framework” for HEIs across Europe, have had an unprecedented impact on harmonising QA at institutional level and fostering a shared, European understanding of IQA.

#### **EQA is developing towards a more integrated vision of quality**

Regarding EQA, it can be said that all EHEA countries have some form of EQA system in place although significant differences in the philosophy and approach behind systems persist. Programme level, compliance focused QA procedures are still the most common form of EQA in the EHEA. There is, however, a pattern that HE systems start with EQA focusing on supervision and ensuring minimum standards, which then evolves towards a more improvement-oriented (and less burdensome) approach. There seems to be a transition taking place, in which programme-level approaches are complemented with institutional approaches. In some cases, this development is explicitly justified as a step towards institutional EQA.

In external, as in internal, QA there is a growing understanding that QA must be integrated with the other Bologna action lines, such as recognition, QFs, and LOs. Indeed, in several European countries, the focus of QA is shifting away from input-centred criteria and teachers’ activities towards intended LOs and assessments, achieved LOs and student experiences. In addition to the shift in focus, QAAs have also seen their missions broaden to include additional dimensions such as the social dimension, lifelong learning or internationalisation. Some stakeholders from QAAs, however, often perceive that this orientates quality assurance more towards policy priorities which in their view makes the balance between quality enhancement and accountability more difficult to reconcile.

Taking into account the legally binding power of QA, it comes as little surprise that EQA is seen by HEIs as the single most influential driver for change as evidenced by the last TRENDS Report.

There are a number of inconsistencies in the activity of QAAs and this report makes recommendations of how to improve QAA practice related to the transparency, consistency and credibility of EQA.

#### **Towards a more perfect union – More work needs to be done in developing the ESG and EQAR as linking elements of the EHEA**

The Study has shown that the ESG and EQAR are establishing itself as reference points in EQA. Agencies’ compliance with the ESG, as evidenced by their membership in ENQA or inclusion in EQAR, is growing. The international visibility of the ESG and EQAR is increasing and countries newly developing QA systems are looking to both for orientation. EQAR could play a more prominent role in representing and

promoting European QA, as well as promoting quality and cooperation of its member agencies. For this to be feasible, however, more funding for EQAR will be necessary.

It has also become apparent, however, that QAA's main motivation to be listed in EQAR is to improve their reputation, to fulfil the expectations of governments or stakeholders, and to facilitate the recognition of institutions or programmes reviewed by the agency, rather than to gain access to a European „market“ for QAAs. So far, governments have been reluctant to allow EQAR-registered agencies to operate in their HE systems, for a number of legitimate reasons. Ministries may fear to lose control over their national HE system, particularly in countries where decisions on HEIs/programmes' funding or existence are based on the outcomes of QA. Ministries may also doubt whether national quality criteria are adequately checked by foreign agencies and EQAR has no provisions that would be suitable to ensure this. Indeed, some of the lack of trust in EQAR-registered agencies can be attributed to the current content and formulations of the ESG. On the flipside, QAAs and governments do not clearly see the added value of creating the international „market“ of QAAs and even among EQAR-registered QAAs, there are doubts about the goal of creating a common European „market“ for EQA. Because of the above mentioned barriers, and despite high stakeholders' expectations it is by no means evident that evaluation from foreign QAAs will soon become commonplace in the EHEA.

Nonetheless, the idea of a strong, European cooperation in EQA, with EQAR as its main pillar, should not be abandoned, for without it the common QA dimension is not complete. A coherent QA framework for EHEA should be a framework in which HEIs are free to choose any EQAR-registered agency for their EQA reviews and in which qualifications are thus universally recognised. EQAR is currently a promise for the future. Whether or not this promise can be delivered, will be decided by the revision of the ESG and the subsequent ability of EQAR to make a strong case for the quality, reliability and soundness of its member agencies' QA procedures.

#### **Building the quality dimension of the EHEA**

Many other developments were also discussed in the Study. It was shown that the development of QFs is slower than expected and that their impact on recognition hinges on an overall orientation at LOs, which need to be understood and fully implemented on the level of programmes, institutions, QAAs, credential evaluators and ENIC-NARICs. It was highlighted that the impact of quality labels is so far not evident, but that they could help to develop subject-specific QFs.

High number of QA-related activities conducted by the E4 organisations in the recent years, their increasing concordance on revising the ESG and in identifying the most important barriers to the European dimension of QA, give reasons to be optimistic. The trend in all areas covered by the report is positive, even though progress is faster in some areas, than in the other. It is of paramount importance to continue an open dialogue on what kind of QA can actually improve quality in European HE. The current revision of the ESG will provide an opportunity to restart the dialogue on how cooperation between HE systems can help to spread good practices within the EU and the entire EHEA.

## 4. ANNEX – EXAMPLES OF GOOD PRACTICES REGARDING INTERNAL QUALITY ASSURANCE

Good practices regarding IQA can be found in many European HEIs. The following selection was largely inspired by a publication by the Polish Foundation for the Development of the Education System<sup>80</sup> and a presentation by a Bologna Expert<sup>81</sup>. Examples are presented in a structure following standards from part 1 of the ESG.

### 1.1. Good practices regarding policy and procedures

#### 1. University of Cambridge Learning and Teaching Strategy<sup>82</sup>, 2012-15 (The United Kingdom)

The document defines:

- 1) Purpose of the strategy and ways in which it is implemented, monitored and revised,
- 2) University's strategic aims in learning and teaching,
- 3) Context in which the strategy is grounded,
- 4) External factors to be taken into account in the revision process,

and sets out priorities regarding:

- 5) Educational and Student Policy and Student Administration
- 6) Student support
- 7) Undergraduate provision (the Tripos system)
- 8) Postgraduate provision (the PhD)
- 9) Postgraduate provision (Master's courses)
- 10) Lifelong Learning and Continuing Professional Development
- 11) Communication and engagement

The University's General Board agrees and periodically reviews an action plan consistent with the strategy, setting out objectives, priorities, timescales, bodies responsible for particular activities, and any resource implications<sup>83</sup>.

#### 2. University of Dundee Strategy<sup>84</sup> to 2017 (The United Kingdom)

The Strategy describes the university's vision and operational context and comprises nine sections:

- categories of service provided:
  - 1) Learning and Teaching,
  - 2) Research,
  - 3) Wider Impact,
- cross-cutting themes of critical importance
  - 4) Internationalisation,
  - 5) Employability, Enterprise and Entrepreneurship,
- enabling themes which represent the resources applied to achieve the aims
  - 6) People
  - 7) Information
  - 8) Estate
  - 9) Financial Sustainability

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<sup>80</sup> [www.ekspcibolonscy.org.pl/sites/ekspcibolonscy.org.pl/files/2013\\_pl\\_zeszyt\\_dobrych\\_praktyk\\_qa\\_www.pdf](http://www.ekspcibolonscy.org.pl/sites/ekspcibolonscy.org.pl/files/2013_pl_zeszyt_dobrych_praktyk_qa_www.pdf), checked on 23/05/2013

<sup>81</sup> [http://ekspcibolonscy.org.pl/sites/ekspcibolonscy.org.pl/files/prz\\_dobre\\_praktyki\\_200513.pdf](http://ekspcibolonscy.org.pl/sites/ekspcibolonscy.org.pl/files/prz_dobre_praktyki_200513.pdf), checked on 28/05/2013

<sup>82</sup> <http://www.admin.cam.ac.uk/offices/education/strategy/strategy.pdf>, checked on 28/05/2013

<sup>83</sup> <http://www.admin.cam.ac.uk/offices/education/strategy/actionplan.pdf>, checked on 28/05/2013

<sup>84</sup> [http://www.dundee.ac.uk/transform/lib/doc/20130312\\_University\\_Strategy\\_to\\_2017.pdf](http://www.dundee.ac.uk/transform/lib/doc/20130312_University_Strategy_to_2017.pdf), checked on 28/05/2013

Each section is underpinned by a separate enabling strategy, which develops the objectives and Key Performance Indicators (KPIs) in more detail. In general, to help assess the progress, 15 KPIs have been identified. They are measured annually and compared with university's own targets as well as, where possible, the performance achieved by competitor institutions. The sections make clear what is required across generic themes and relate to the global challenges the university aims to address.

### 3. **Lund University's policy for QA and quality enhancement of education**<sup>85</sup>, 2009–2012 (Sweden)

The policy, adopted by the University Board, is based on the university's strategic plan and covers first, second and third cycle studies. It defines methods and orientation for Lund University's efforts to follow up, support and develop the education provided, including guidelines and tools for course and programme directors, teachers, as well as doctoral and undergraduate students. The document refers to the ESG as the starting point for IQA, and – inter alia – describes:

- 1) 4 strategies to achieve highest quality of education, that underpin the policy: quality assurance; cross-disciplinary collaboration; internationalisation; leader, teacher and employee excellence,
- 2) background and organisation of IQA,
- 3) methodology and orientation of work on quality,
- 4) follow-up and monitoring of the policy, as well as action plans,
- 5) other policies and actions plans of importance to work on the quality of education (e.g. action plan for widened participation at Lund University, plan for the supply of skills, guidelines for the relationship between Lund University and its students, internationalisation policy etc.).

The policy provides a comprehensive framework for practices undertaken at faculty level. It is implemented through action plans, one for first and second cycle studies and the other for third cycle (research) studies, designed for a two year-time horizon. Each faculty is required to implement and further develop the policy in its respective field of activity and is accounted for its realisation.

### 4. **University of Lisbon QA Policy**<sup>86</sup> (Portugal)

The document, approved by the Senate, outlines the institutional guidelines for IQA including:

- 1) QA Policy (aims and guiding principles of IQA)
- 2) QA System (self-evaluation, external evaluation, frequency of evaluation moments)
- 3) Information system (formulation of guidelines and codes of good practice, common procedures for collection and processing of information, disclosure and use of the evaluation results)
- 4) Review of the QA policy
- 5) Evaluation benchmarks of:
  - a. the educational policies (educational offer, management of education, evaluation of students, evaluation of education)
  - b. the research policies
  - c. the student and social welfare services
  - d. the technical-administrative management policy (description of staff, organisational system, ties established with the outside world, the communication system)
- 6) Glossary of QA terms.

### 5. **Durham University's Learning and Teaching Handbook**<sup>87</sup> (The United Kingdom)

The Handbook is part of the university's information portal aimed at collating and making publicly available the existing internal guidance and procedures on undergraduate and postgraduate teaching and learning matters in one place. Its structure is logically divided into main theme sections, such as:

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<sup>85</sup>[http://www5.lu.se/upload/RULESandREGULATIONS/Policyforqualityassuranceandqualityenhancementofeducation2009\\_2012.pdf](http://www5.lu.se/upload/RULESandREGULATIONS/Policyforqualityassuranceandqualityenhancementofeducation2009_2012.pdf), checked on 28/05/2013

<sup>86</sup><http://www.ul.pt/pls/portal/docs/1/246053.PDF>, checked on 28/05/2013

<sup>87</sup><https://www.dur.ac.uk/learningandteaching.handbook/>, checked on 28/05/2013



- 1) admission of students,
- 2) monitoring student progress,
- 3) curriculum development,
- 4) programme and colleges review and monitoring,
- 5) student feedback,
- 6) examination and assessment,
- 7) external review.

Each section has its own, highly developed and transparent thematic structure providing easy and quick access to information. Additionally the required information can be sought via keyword index or a browser. The Handbook is systematically updated and the changes listed in a relevant section.

#### 6. **Oxford University's Learning and Teaching Handbook**<sup>88</sup> (The United Kingdom)

The Handbook sets in the university context the QA framework for British HE. It focuses on major areas of QA and quality enhancement that the University's Education Committee and the divisions (drawing on national guidance and expectations) see as being of major importance to any faculty/department in maintaining appropriate oversight of their existing arrangements, i.e.:

- 1) Admissions
- 2) Induction
- 3) Course design, approval, monitoring and review
- 4) Student feedback
- 5) Student complaints and appeals
- 6) Statistical information
- 7) External input
- 8) Quality enhancement in learning and teaching
- 9) Monitoring of teaching
- 10) Postgraduate research degrees
- 11) Collaborative provision and placement learning

### 1.2. Good practices regarding approval, monitoring and review of programmes and awards

#### 1. **University's of Salford Manchester programme design, approval, amendment, review and withdrawal system**<sup>89</sup> (The United Kingdom)

At the University of Salford Manchester programmes are subject to clearly defined QA principles and procedures, which envisage the involvement of the academic community, including students, as well as external, independent advisors in the periodic review and re-approval of programmes. In defining its own procedures, the University took account of best practices in the UK HE sector and the indicators and guidance articulated by the British Quality Assurance Agency *Quality Code*<sup>90</sup>.

All policies and procedures regarding programmes are collated in an on-line Academic Handbook<sup>91</sup> and presented in a standard format, including: purpose, principles, regulation, procedure, guidance, as well as glossaries, flowcharts (process diagrams), review dates and contact persons. They identify responsibilities, recommended key dates for process implementation and relevant forms/templates to be used within the process<sup>92</sup>. The review system is based on the:

<sup>88</sup> [http://www.admin.ox.ac.uk/media/global/wwwadminoxacuk/localsites/educationcommittee/documents/QA\\_Handbook.pdf](http://www.admin.ox.ac.uk/media/global/wwwadminoxacuk/localsites/educationcommittee/documents/QA_Handbook.pdf)

<sup>89</sup> [http://www.governance.salford.ac.uk/cms/resources/uploads/File/AQA/Programme\\_Design\\_Approval\\_Amendment\\_Review\\_and-Withdrawal.pdf](http://www.governance.salford.ac.uk/cms/resources/uploads/File/AQA/Programme_Design_Approval_Amendment_Review_and-Withdrawal.pdf)

<sup>90</sup> <http://www.qaa.ac.uk/AssuringStandardsAndQuality/quality-code/Pages/Quality-Code-Part-B.aspx>

<sup>91</sup> [http://www.governance.salford.ac.uk/page/academic\\_handbook](http://www.governance.salford.ac.uk/page/academic_handbook)

<sup>92</sup> [http://www.governance.salford.ac.uk/page/aqa\\_forms](http://www.governance.salford.ac.uk/page/aqa_forms)

- 1) Annual Programme Monitoring and Enhancement (APME) process, which provides detailed statistical information on admissions, widening participation, retention, progression/ completion, student and staff feedback, external examiners' comments, changes to the programme, strengths and weaknesses used to inform action planning for the following academic year and review of actions from the previous academic year. Reports are produced for individual programmes (by programme leaders), as well as summarised at School/College and institutional level for collaborative provision. Summary reports forward issues for institutional consideration to Senate's Learning, Teaching and Enhancement Committee (LTEC), which has oversight of the entire APME process and makes reports to Senate on its outcomes.
- 2) External Examiners' Reports, available for all programmes and in a form of an annual institutional overview report summarising issues and proposing actions for LTEC consideration.
- 3) Periodic Programme Review and Re-Approval (PPRR). In addition to APME, programmes undergo a more detailed review every 5 years, which results in a decision to re-approve a programme (possibly with conditions and recommendations) or withdraw it. The review includes reflection by the programme team and School, student opinion, feedback from employers, professional bodies, external examiners, statistical data and formal update of the programme specification.

All reports are publically available<sup>93</sup>. Easy access to APME reports (produced at all levels) is ensured via a 3 step search Wizard (including browser by keywords, types of reports<sup>94</sup>).

Student views on programmes are sought in a number of ways e.g. Staff-Student Committees, Module Evaluation Questionnaires, UK National Student Survey and Salford's own internal student survey, conducted on a biennial basis. Student views feed into both the APME and PPRR processes.

### 1.3. Good practices regarding assessment of students

1. **The UK Quality Code for HE** published by the national Quality Assurance Agency for Higher Education (QAA) serves as a reference point for UK HE providers. It sets out expectations that HEIs are required to meet and which express key matters of principle that the HE community has identified as important for the assurance of quality and academic standards. Each chapter of the Quality Code comprises a series of indicators which HEIs have agreed reflect sound practice, and through which institutions can demonstrate that they meet relevant expectations. In particular, chapters B6 (Assessment of students and accreditation of prior learning) and B7 (External examining) relate closely to 1.3. ESG Standard<sup>95</sup>.

### 1.4. Good practices regarding QA of teaching staff

1. Many European HEIs have established or developed **educational development centres**, such as the Teachers Academy at University of Helsinki<sup>96</sup> (Finland) or the Teaching and Learning Team at University College Dublin<sup>97</sup>. Numerous good practices can be found in the UK, i.e.:
  - 1) Institute for Academic Development at University of Edinburgh<sup>98</sup>
  - 2) Centre for Educational Development at Queen's University Belfast<sup>99</sup>

<sup>93</sup> <http://www.governance.salford.ac.uk/page/overviews>

<sup>94</sup> <http://www.governance.salford.ac.uk/apme/search.php>

<sup>95</sup> <http://www.qaa.ac.uk/AssuringStandardsAndQuality/quality-code/Pages/Quality-Code-Part-B.aspx>

<sup>96</sup> <http://www.helsinki.fi/opettajienakatemia/eng>

<sup>97</sup> <http://www.ucd.ie/teaching/>

<sup>98</sup> <http://www.ed.ac.uk/schools-departments/institute-academic-development>

<sup>99</sup> <http://www.qub.ac.uk/directorates/AcademicStudentAffairs/CentreforEducationalDevelopment/>

- 3) Educational Development Division of the Centre for Lifelong Learning at the University of Liverpool<sup>100</sup>
- 4) Learning Development Centre at City University London<sup>101</sup>
- 5) Learning and Development Centre at the University of Warwick<sup>102</sup>

2. **The University of Edinburgh Principal's Teaching Award Scheme<sup>103</sup>** (The United Kingdom)

The PTAS is an annual scheme which provides funding to support learning and teaching enhancement. It aims to encourage and support activities that will make a significant contribution to the enhancement of learning and teaching at the University, at both undergraduate and postgraduate level. It has been running since 2007, with annual funding of £110,000. It offers academic staff at the opportunity to apply for grants for either discipline-specific pedagogical research projects or development projects aimed at enhancing teaching, learning or assessment practices. It encourages better understanding of student learning through pedagogical innovation and research. It is not intended to reward past excellence in teaching.

3. **Jagiellonian University's<sup>104</sup> Ars Docendi package for didactic development of academic teachers** (Poland)

The *Ars Docendi* Rector's Fund for Didactic Development subsidises innovative didactic projects related to studies conducted in foreign languages, programmes giving the opportunity of obtaining joint diplomas and programmes related to modern information and communications technologies. The cyclical *Ars Docendi* teaching courses are intended for young academic teachers and PhD students. The aim is to prepare participants to become successful academic teachers. Courses help to develop teaching skills through meetings with eminent specialists from various fields of study. The Rector's award *Pro Arte Docendi* recognises the achievements of teachers in delivering high quality of education.

4. The LearnHigher project<sup>105</sup> was one of the 74 **Centres for Excellence in Teaching and Learning (CETLs)** which, until 2010, received funding within a CETL programme managed by Higher Education Founding Council for England. This initiative was part of a broader move to enhance the status of learning and teaching in HE, bearing in mind that esteem and reward systems within HEIs were often more likely to recognise excellence in research than teaching. LearnHigher aimed to develop, evaluate and share peer-reviewed resources to support students' learning development, and to conduct practice-led research into the effective use of those resources. Report on the evaluation of the CETL programme<sup>106</sup> provides evidence of good examples and raises a number of questions to be considered in relation to further sustaining CETLs activity.

### 1.5. Good practices regarding learning resources and student support

1) **University's of Bedfordshire Professional Academic Development (PAD) Team<sup>107</sup>** (The United Kingdom)

The PAD Team supports students to develop and enhance their academic skills via:

- a) workshops,

<sup>100</sup> <http://www.liv.ac.uk/eddev/index.htm>

<sup>101</sup> <http://www.city.ac.uk/about/education/ldc>

<sup>102</sup> <http://www2.warwick.ac.uk/services/ldc/>

<sup>103</sup> <http://www.ed.ac.uk/schools-departments/institute-academic-development/learning-teaching/staff/news/funding/about-ptas>

<sup>104</sup> <http://www.uj.edu.pl/en>

<sup>105</sup> <http://www.learnhigher.ac.uk>

<sup>106</sup> [http://www.hefce.ac.uk/media/hefce/content/pubs/indirreports/2011/re1111evalofcetl/rd11\\_11.pdf](http://www.hefce.ac.uk/media/hefce/content/pubs/indirreports/2011/re1111evalofcetl/rd11_11.pdf)

<sup>107</sup> <http://lrweb.beds.ac.uk/help/pad>

- b) drop-ins and appointments with tutors,
- c) a virtual platform providing access to a wide range of resources related to academic skills<sup>108</sup>,
- d) a list of suggested literature (on general study skills, assignment writing, maths and statistics, exams, critical thinking, dissertation and thesis writing, reading, information literacy, computer skills, etc.).

### 1.6. Good practices regarding information systems

#### 1) Jagiellonian University's system of student surveys (Poland)

The system of student surveys developed at the University comprises of:

- a) surveys for university applicants,
- b) student evaluation of teaching,
- c) student evaluation of the work of administration (support services),
- d) student satisfaction barometer (evaluation of various aspects of studying),
- e) student surveys on key competences, values, extracurricular activities,
- f) surveys for graduates (monitoring their employment status).

More information can be found in the university's information guide on the survey campaigns<sup>109</sup>.

### 1.7. Good practices regarding public information

#### 1) Many European HEIs publish on-line course/module catalogues, providing easy access (via browser) to detailed information on the programmes they are offering, e.g.:

- a) University of Oxford<sup>110</sup>
- b) University of Antwerp<sup>111</sup>
- c) University of Amsterdam<sup>112</sup>
- d) University of Iceland<sup>113</sup>
- e) Maria Curie-Skłodowska University<sup>114</sup>
- f) AGH University of Science and Technology<sup>115</sup>

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<sup>108</sup> <http://lrweb.beds.ac.uk/help/pad/pad-blackboard-resources>

<sup>109</sup> <http://www.jakosc.uj.edu.pl/documents/1609422/3160141/USDJK.INFORMATOR.EN.pdf>

<sup>110</sup> [http://www.ox.ac.uk/admissions/undergraduate\\_courses/courses/index.html](http://www.ox.ac.uk/admissions/undergraduate_courses/courses/index.html)

<sup>111</sup> [http://studiegids.uva.nl/2012\\_2013/WebSite\\_en](http://studiegids.uva.nl/2012_2013/WebSite_en)

<sup>112</sup> <http://www.ua.ac.be/main.aspx?c=.OODE2012&n=104943>

<sup>113</sup> <https://ugla.hi.is/kennsluskra/index.php?tab=skoli&chapter=content&id=-2013>

<sup>114</sup> <http://old.sjk.umcs.lublin.pl/en/sylabus/search>

<sup>115</sup> [http://syllabuskrk.agh.edu.pl/2012-2013/en/treasuries/academy\\_units/offer](http://syllabuskrk.agh.edu.pl/2012-2013/en/treasuries/academy_units/offer)

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