



**Recognising International Quality
Assurance Activity in the European
Higher Education Area (RIQAA)**

Final Project Report

(December 2014)



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Executive Summary

The European Quality Assurance Register for Higher Education (EQAR) was established to enhance transparency and information on credible quality assurance agencies operating in Europe and to facilitate the recognition of their decisions. Amongst other objectives, higher education institutions could use the Register to choose to be evaluated by a registered quality assurance agency that suits their mission and needs. The Bucharest Communiqué has put this aim more prominently at the forefront of the Bologna agenda. The recognition of cross-border external quality assurance activities of EQAR-registered agencies would further stimulate the recognition of degrees and qualifications and enhance the European dimension to quality assurance.

The RIQAA project revealed that quality assurance agencies have rapidly expanded their international activities, and higher education institutions are keen to take advantage from the opportunities of a cross-border external review. They recognise as main benefits the development of an international profile, a review that best suits their needs, and enhanced recognition of their degrees.

Yet, the national frameworks are lagging behind: the number of countries that allow their higher education institutions to work with a suitable quality assurance agency from abroad is small, although cross-border reviews are a reality in almost all EHEA member countries. International evaluations or accreditations in these countries often happen in addition and parallel to the national, mandatory external quality assurance, rather than being recognised as part of it. This leads to an unproductive duplication of efforts and does not contribute to promoting a genuine European dimension to quality assurance.

In order to enhance cross-border external quality assurance and to promote the European dimension in quality assurance, a number of recommendations have been formulated with a view to the upcoming EHEA Ministerial Communiqué in May 2015 in Yerevan. EHEA ministers and governments are therefore recommended to fully implement their commitments made in the Bucharest Conference and in particular to:

- recognise their higher education institutions' responsibility for their own quality and enable them to choose a non-national EQAR-registered quality assurance agency (in fulfilling their initial or periodic accreditation, evaluation or audit);
- recognise the use of ESG as a common basis for quality assurance in the EHEA and remove additional requirements on top of EQAR registration for quality assurance

agencies before being able to operate in their country;

- provide clear and transparent information (in English as well) on the conditions under which foreign EQAR-registered agencies may operate in their country;
- review national regulations that present obstacles to the ESG-compliant external quality assurance framework, thus help their national agency/agencies to be compliant with the ESG by adapting legislation where necessary;
- strengthen EQAR by becoming Governmental Member and participating actively in the organisation's work.

The last two chapters of the report elaborate further on the conclusions and contain additional recommendations, addressed to quality assurance agencies, higher education institutions and EQAR.

1. Introduction

1.1 Aims and Objectives

The current project “**Recognising International Quality Assurance Activity in the EHEA (RIQAA)**” aims to inform stakeholders and policy makers on the existing legal practices in the European Higher Education Area (EHEA) countries recognising EQAR-registered agencies and on the experiences of quality assurance agencies and higher education institutions in using the existing possibilities for quality reviews by foreign quality assurance agencies.

To that end, the project examined the existing national legal frameworks of EHEA members for cross-border external quality assurance (EQA) activities, the cross-border activity of quality assurance agencies and the higher education institutions experiences with cross-border EQA reviews.

The results are intended to inform governments and stakeholders in the European Higher Education Area (EHEA), in particular HEIs and QAAs. They will be able to build upon the good practice existing in the analysed countries, learn from the results of the analysis on the rationale for internationalising quality assurance activities and use the conclusions drawn to inform their policy debates.

1.2 Background

The aim that EQAR-registered quality assurance agencies would be recognised throughout the entire EHEA, and that higher education institutions (HEIs) would be able to choose freely to work with any registered agency, was set out as one of the objectives for EQAR in the E4 Group¹ Report to the London Conference of Ministers on a European Register of Quality Assurance Agencies (2007), endorsed by the London Ministerial Communiqué, and the European Commission’s Report on Progress in Quality Assurance of Higher Education (2009).

In January 2012, the EQAR General Assembly, including representatives of European governments and stakeholder organisations, further emphasised this aim by agreeing that the promotion of recognition of registered agencies is a strategic priority in EQAR’s work during the years to come and the 2012-2013 EQAR plan of work specifically points out the need to conduct an analysis of recognition for EQAR registered agencies.

In April 2012, the EHEA ministers underlined in the Bucharest Communiqué that they ‘will allow EQAR-registered agencies to perform their activities across the EHEA, while complying with national requirements’ and that they ‘will aim to recognise quality assurance decisions of EQAR-registered agencies on joint and double degree programmes.’

Ministerial commitments have also transpired in the set up of internal quality assurance systems. EUA’s Examining Quality Culture survey (2010) and EURASHE’s study (2012)

¹ The E4 Group here refers to four European stakeholders in higher education: The European Association for Quality Assurance in Higher Education (ENQA), the European Students’ Union (ESU), the European University Association (EUA) and the European Association of Institutions in Higher Education (EURASHE).

indicate that most institutions developed or changed their internal QA under the influence of Quality Assurance Agencies (QAAs) and/or national regulations. With the Bucharest commitment, Ministers further supported higher education institutions in developing their internal QA and provided them with the opportunity of choosing among any EQAR-registered agencies. This would allow them to select a QAA according to their own mission and profile based on a coherent and flexible external quality assurance system for Europe as a whole.

1.3 Research questions

The project was based on the following specific research questions:

- A. Have EHEA countries opened up their borders to EQAR-registered agencies? What are the legal provisions in countries that recognize the decisions and results of EQAR-registered agencies?
- B. What is the extent of the cross-border external quality assurance activity of QA agencies within EHEA? What are the opportunities and challenges faced by QA agencies carrying out reviews across borders?
- C. What is the rationale of a HEI for commissioning a foreign QA agency and what are the results of this review? What is the experience of a higher education institution (HEI) or programme with a review conducted by a foreign QA agency (evaluation/audit/accreditation)?

1.4 Results

The project has provided a mapping of the legal frameworks allowing the use of internationally active (EQAR-registered) QAAs in EHEA member countries and territories, an analysis of their use by HEIs in different countries, as well as a qualitative analysis on the international external QA activity of quality assurance agencies.

1.5 Time-line

The implementation of the project took place between October 2013 and October 2014.

2. Openness of EHEA Countries to Cross-Border External Quality Assurance Activity

According to the 2012 Bologna Process implementation report², twelve EHEA national systems claim that all HEIs are free to be evaluated by QAAs other than their own (not necessarily EQAR-registered), while another eight countries suggest that under certain conditions, some agencies are able to pursue this route.

2.1 Methodology

Desk research has been carried out within this project to improve our understanding of the current situation and detail the conditions deemed necessary by countries to trust a foreign QAA to operate on their national territory. The analysis also intends to clarify the responses to the Bologna Follow-Up Group (BFUG) questionnaire³ of some countries, between allowing foreign EQAR registered QAAs to evaluate HEIs/programmes within the statutory external QA requirements and the considerations made regarding the additional evaluations by EQAR registered QAAs (not recognised as part of the EQA requirements).

The overview includes countries where legislation permits institutions to undergo quality reviews by foreign agencies, based on the fact that they are registered on EQAR, irrespective of whether EQAR registration is the only requirement or further requirements are imposed, and irrespective of whether this relates to all (obligatory) external quality assurance or is limited to specific circumstances, such as quality assurance of joint degrees.

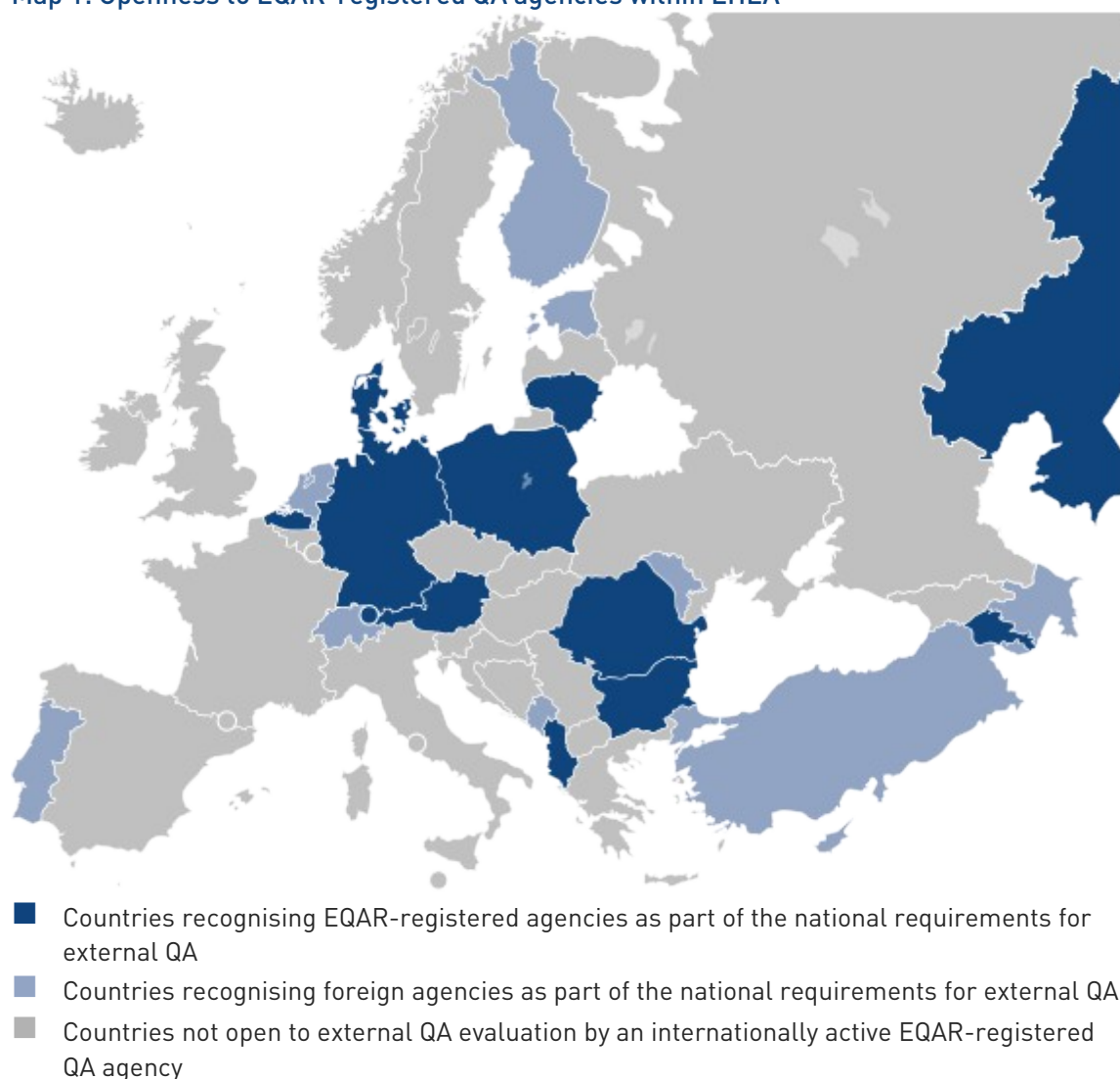
² <http://www.ehea.info/Uploads/%281%29/Bologna%20Process%20Implementation%20Report.pdf>

³ BFUG Questionnaire is a stocktaking exercise carried out jointly by Eurostat, Eurydice and Eurostudent. EHEA member countries and territories are asked to fill in the questionnaire and provide brief information on their education system and the measures undertaken at the national or institutional level to meet the goals established within their previous Ministerial Communiqués.

2.2 Mapping the Openness of EHEA Countries

The preliminary results of the project show that there are currently 12 EHEA countries (Table 1) that allow their higher education institutions to use an EQAR-registered QA agency *to discharge their obligatory external quality assurance obligations*. Some additional countries (see Map 1 and italics in Table 2) use different requirements than EQAR registration for allowing QA agencies from other countries to operate.

Map 1: Openness to EQAR-registered QA agencies within EHEA



The analysis of the legal frameworks (Table Table 1) shows that 20 of the EHEA member countries allow (under certain conditions) their higher education institutions (some or all) to discharge their obligatory external quality assurance (EQA) requirement with a foreign quality assurance agency (QAA). 12 of these 20 EHEA members have specifically referenced EQAR registration within their legal provisions. The recognition of EQAR-registered agencies was done in most cases after the London Communiqué (2007) and the establishment of EQAR but before the adoption of the Bucharest Communiqué. Only two countries have established legal provisions after the Bucharest Ministerial meeting, i.e. Belgium-Flemish Community and Armenia. The recent years point to a rather slower progress of EHEA members making further changes in their legal framework allowing their higher education institutions (HEIs) to choose among QAAs listed in EQAR.

Table 1: Legal frameworks

Country	Existing legal practices allowing higher education institution to discharge their obligatory EQA obligations (How countries use EQAR as a reference to recognise foreign QAAs? / What criteria are in place for enabling the operation of internationally active QAAs?)	Openness to the cross-border EQA activity of EQAR-registered agencies?
Albania	<p>All Albanian higher education institutions are able to choose for their external evaluation an EQAR-registered QA agency.</p> <p>The external evaluation conducted by these agencies should be done in accordance with standards and procedures adopted by the Ministry of Education and Science. The activity of these agencies in the Republic of Albania may be temporary or they may become permanent. When they exert a permanent activity, the agency must acquire legal personality according to the Albanian law.</p> <p>Based on the review report by the agency, the Accreditation Council (collegial body, part of the HE Public Accreditation Agency) provides a recommendation to the Minister of Education and Science, who makes the final decision about the institutional accreditation and/or the recognition of the education programs both for public and private institutions.</p> <p>Source: Ministry Decision No.424, date 02.6.2010 on the approval of the regulation of accreditation system, organisation and operation of institutions of external quality assurance (amended No.368, date 14.4.2011) http://www.aaal.edu.al/en/regulation.html</p>	Since 2011
Andorra	No legislation/regulation regarding cross-border EQA	Not Applicable
Armenia	<p>All HEIs are able to choose a foreign 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.</p> <p>Source: Government Decision No 301 dated on March 19, 2014 on amendments and supplements in the Government Decision No. 978 dated June 30, 2011 on Regulation of State Accreditation of the Educational Institutions</p>	Since 2014
Austria	<p>Public universities in Austria have their internal quality assurance system certified in a periodic external audit. For these audits, universities are free to choose any EQAR-registered agency. Universities of applied sciences will also benefit from this option once they have been accredited by the Austrian Agency for Quality Assurance (AQA) for two six-year terms.</p> <p>Source: Act on Quality Assurance in Higher Education (HS-</p>	Since, March 2012

Table 1: Legal frameworks

	<p>QSG) from March 2012 (§ 19.)</p> <p>http://www.bmwf.gv.at/fileadmin/user_upload/legislation/E_HS-QSG.pdf (page14)</p>	
Azerbaijan	<p>All HEIs are able to choose a foreign QAA. Though the legislation doesn't prohibit HEIs from choosing a quality assurance agency outside Azerbaijan, there have been no HEIs that applied to a foreign agency for external evaluation.</p> <p>Source: Bologna National Report 2012</p>	Open, no EQAR reference
Belgium/ Flemish Community	<p>Higher education institutions in the Flemish Community of Belgium can choose to have their accreditation review carried out by foreign EQAR-registered agencies.</p> <p>This review will be the basis for accreditation of the study programmes by the NVAO. All EQAR-registered agencies are automatically entitled to carry out the assessment reviews. While they do not have to be included on a special list or register, agencies will have to agree to the Terms of Reference with NVAO.</p> <p>Source: Appendix to the Codes of the decree provisions relating to higher education</p> <p>https://admin.kuleuven.be/rd/codexhogeronderwijs</p>	Since, 2012
Belgium/ French Community	No legislation/regulation regarding cross-border EQA	Not Applicable
Bosnia- Herzegovina	No legislation/regulation regarding cross-border EQA	Not Applicable
Bulgaria	<p>Bulgarian higher education institutions (HEIs) have the possibility to commission a foreign EQAR-registered QA agency for their compulsory accreditation, at the programme as well as the institutional level. The foreign agency will have to use the same criteria and mark-based system as the national agency, NEAA.</p> <p>Source: Amendments to the Higher Education Act of August 2011 (Art. 88, para. 3) assessing the procedures for institutional and program accreditation</p> <p>http://siteresources.worldbank.org/BULGARIAEXTN/Resources/305438-1307440973243/Bulgaria-Higher-Education-executive-summary-March-2012-EN.pdf</p>	Since 2011
Croatia	No legislation/regulation regarding cross-border EQA	Not Applicable
Cyprus	No legislation/regulation regarding cross-border EQA	Not Applicable

Table 1: Legal frameworks

Czech Republic	No legislation/regulation regarding cross-border EQA	Not Applicable
Denmark	<p>Automatic recognition of accreditation by EQAR-registered agencies for joint degrees and joint programmes.</p> <p>Danish institutions may only issue Danish diplomas for programmes offered abroad if these programmes are accredited either by the national Danish Accreditation 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.</p> <p>Source: Bologna National Report 2012</p>	Since 2011 and extended to all joint degree programmes in 2014
Estonia	<p>All HEIs need to submit themselves to institutional level accreditation by the Higher Education Quality Agency or (with its approval) by a competent foreign QAA at least once in seven years. According to the Estonian Universities Act, institutional accreditation or assessment of study program groups can be performed by a competent quality agency of a foreign state if it has been approved by EKKA. Among the selection criteria for potential assessment authorities are transparency and the conformity with the ESG. EQAR registration has not been listed as a prerequisite, however EQAR registration serves as guarantee that the conformity with the ESG exists and therefore no further investigation is needed.</p> <p>While the assessment can be conducted by a foreign agency, the final decision still has to be made by the EKKA Council which has to endorse the assessment report of the foreign QA agency.</p> <p>Source: Bologna National Report 2012</p>	Open, indirect reference to EQAR
Finland	HEIs can choose a foreign agency, as regulated by the Universities Act and Polytechnic Act. The model for external evaluation must fulfil the following conditions: the evaluation must cover both other activities and the quality assurance system of the institution, evaluations must be conducted regularly and all results of the evaluations have to be made public.	Open, no EQAR reference
France	No legislation/regulation regarding cross-border EQA	Not Applicable
Georgia	No legislation/regulation regarding cross-border EQA	Not Applicable
Germany	For their periodic accreditation of their study programmes or quality assurance systems German higher education institutions (HEIs) can choose from amongst QA agencies that are accredited by the German Accreditation Council, a national regulatory body.	Since 2009 (joint programmes)

Table 1: Legal frameworks

	<p>Foreign quality assurance agencies can be recognised by the German Accreditation Council after having demonstrated that they apply the national frameworks. There is no requirement to be registered on EQAR.</p> <p>Recognised agencies can also ratify individual accreditation decisions by other agencies on joint programmes between a German and foreign institution. This is subject to the agency being registered on EQAR or a full member of ENQA.</p> <p>Source: http://www.akkreditierungsrat.de/fileadmin/Seiteninhalte/AR/Beschluesse/en/AR_Regeln_Studiengaenge_en_aktuell.pdf </p>	
Greece	No legislation/regulation regarding cross-border EQA	Not Applicable
Holy See	No legislation/regulation regarding cross-border EQA	Not Applicable
Hungary	No legislation/regulation regarding cross-border EQA	Not Applicable
Iceland	No legislation/regulation regarding cross-border EQA	Not Applicable
Ireland	No legislation/regulation regarding cross-border EQA	Not Applicable
Italy	No legislation/regulation regarding cross-border EQA	Not Applicable
Kazakhstan	<p>Institutions are subject to periodic institutional and programme accreditation. They can have their programmes accredited by any quality assurance agency listed on the Kazakh national register of accreditation bodies. Quality assurance agencies from other countries in the European Higher Education Area (EHEA) can be included on the national register of agencies subject to the condition that they are EQAR-registered.</p> <p>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 periodically re-evidence their substantial compliance with the European Standards and Guidelines (ESG) through an external review every five years.</p>	Since 2011
Latvia	No legislation/regulation regarding cross-border EQA	Not Applicable
Liechtenstein	<p>Liechtenstein legislation requires the higher education institution to seek accreditation by any EQAR-registered agency. The country has decided not to establish an own national agency.</p> <p>Source: Eurydice & Bologna National Report 2012 http://daneshnamehicsa.ir/userfiles/file/Resources/18-3%29%20Europa/Liechtenstein_EN.pdf </p>	Since 2009

Table 1: Legal frameworks

Lithuania	<p>Lithuanian HEIs are subject to regular accreditation at both institutional and programme level. For programme accreditation, HEIs can opt for an external review conducted by any EQAR-registered QA agency. The actual accreditation decision, however, remains the responsibility of the national QA agency, SKVC.</p> <p><i>Source: Procedure for the external evaluation and accreditation of study programmes”, issued by the Minister of Education and Science of the Republic of Lithuania from 2009 (revision of Order No. V-1487, of 29 July 2011)</i></p> <p>http://www.skvc.lt/files/teises_aktai/akreditavimo_tvarka.pdf</p>	Since 2009
Luxembourg	No legislation/regulation regarding cross-border EQA	Not Applicable
Malta	<p>There are current discussions on opening the EQA framework to EQAR-registered agencies</p> <p>Source: http://www.ncfhe.org.mt/uploads/filebrowser/National%20Quality%20Assurance%20Framework_2.pdf</p>	Not Applicable (so far)
Moldova	<p>HEIs can choose for their periodic evaluation either the national or a foreign agency.</p> <p>Source: http://www.kvalifikacije.hr/fgs.axd?id=329</p>	Open, no EQAR reference
Montenegro	<p>All HEIs can choose foreign QAAs, provided that they are ‘licensed and recognized as respectable in the field of quality assurance’. In accordance with the Law on Higher Education the decision to contract a foreign quality assurance agency, upon the request of HEIs, is carried out by the Ministry.</p> <p>Source: Bologna National Report 2012 & EACEA national Report</p> <p>http://eacea.ec.europa.eu/tempus/participating_countries/overview/Montenegro.pdf</p>	Open, no EQAR reference
Netherlands	<p>All HEIs are able to choose a foreign agency, provided it is considered trustworthy by the NVAO and agrees to the Terms of reference; in practice the agency must be a member of ECA.</p> <p>Source: Bologna National Report 2012</p>	Open, no EQAR reference
Norway	No legislation/regulation regarding cross-border EQA	Not Applicable
Poland	<p>Polish HEIs may request foreign EQAR-registered QA 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-</p>	Since 2011

Table 1: Legal frameworks

	<p>registered agency in order to apply for the right to offer doctorate degrees.</p> <p>Foreign higher education institutions (HEIs) that have been accredited by any EQAR-registered agency have the right to establish branch HEIs or departments in Polish.</p> <p>Source: BFUG Consultation</p>	
Portugal	<p>Some HEIs are allowed to choose foreign QAAs. The National QA Agency decides which results of foreign agencies will be accepted and will progressively establish protocols of agreement with other agencies. Reference made to Article 13, Law 38/2007, 16 August and Article 11 of the Agency's statutes defined in Decree-Law 39/2007, 5 November.</p>	Open, no EQAR reference
Romania	<p>The accredited HEIs in Romania are entitled to accreditation by the national QA agency, ARACIS or any other EQAR registered agency. The external review body must comply with the national regulation and other international field related standards.</p> <p>Source: Bologna National Report 2012 & Law on the approval of the Government Emergency Ordinance No. 75/2005 regarding the education quality assurance http://www.aracis.ro/uploads/media/Law_87_2006.pdf</p>	Since 2006, updated 2011
Russian Federation	No legislation/regulation regarding cross-border EQA	Not Applicable
Serbia	No legislation/regulation regarding cross-border EQA	Not Applicable
Slovak Republic	No legislation/regulation regarding cross-border EQA	Not Applicable
Slovenia	No legislation/regulation regarding cross-border EQA	Not Applicable
Spain	No legislation/regulation regarding cross-border EQA	Not Applicable
Sweden	No legislation/regulation regarding cross-border EQA	Not Applicable
Switzerland	Universities of Applied Science may choose from a list of foreign QAAs recognised by the Federal Department of Economic Affairs.	Open, no EQAR reference
"the Former Yugoslav Republic of Macedonia"	No legislation/regulation regarding cross-border EQA	Not Applicable
Turkey	Universities are free to choose a foreign QAA, but since there is no legal document detailing the implementation of this provision, the tendency among universities is to	Open, no EQAR reference

Table 1: Legal frameworks

	choose an agency which is internationally credible.	
Ukraine	No legislation/regulation regarding cross-border EQA	Not Applicable
UK/ England, Wales, Northern Ireland	No legislation/regulation regarding cross-border EQA	Not Applicable
UK/Scotland	No legislation/regulation regarding cross-border EQA	Not Applicable

The existing legal frameworks differ in detail: some countries allow all HEIs to choose any EQAR-registered agency for all types of external quality assurance obligations they are subject to. In other countries, the possibility to choose a quality assurance agency is limited to a certain group of HEIs (e.g. public universities and university colleges in Austria) or to certain types of external QA (e.g. only for programme accreditation, but not for institutional accreditation; or not for initial accreditation), see Table Table 2. Some countries only recognise reviews by foreign QA agencies for joint degrees, transnational provision or other, specific circumstances.

Table 2: Characteristics of national frameworks on their openness to cross-border EQA

Country ⁴	Which agencies?		Which HEIs?			Which types of EQA?		Recognition?	
	EQAR-reg.	National req.	All	Some	Only JD/TNE	Inst.	Prog.	Directly	Approval
BG	●		●			●	●	●	
DK	●		●				●	●	
LI	●		●			●	●	●	
RO	●		●			●	●	●	
AT	●			●		●		●	
PL	●		●			●	●		●
KZ		●	●				●	●	
AL	●		●			●	●		●
AM	●		●			●	●		●
BE-fl	●		●				●		●
LT	●		●				●		●
DE*	●				●		●		●
EE		●	●			●	●		●
AZ		●	●			●	●	●	
DE*		●	●			●	●	●	

⁴ See Annex1 for the ISO Country Codes

Table 2: Characteristics of national frameworks on their openness to cross-border EQA

Country	Which agencies?		Which HEIs?			Which types of EQA?		Recognition?	
	EQAR-reg.	National req.	All	Some	Only JD/TNE	Inst.	Prog.	Directly	Approval
FI		•	•			•		•	
MD		•	•			•	•	•	
CH		•		•			•	•	
ME		•	•			•	•		•
NL		•	•				•		•
PT		•	•			•	•		•
TR		•	•			•	•		•

2.3 Current practices of external quality assurance of joint programmes

Despite the clear commitment of ministers, even for the specific case of joint programmes only a small number of countries do currently allow those to be evaluated/accredited by a foreign, EQAR-registered quality assurance agency.

While there have been a number of promising projects to pilot single accreditation/evaluation procedures, external quality assurance of joint programmes is often “fragmented”: different agencies from different countries each review the bits and pieces of the programme delivered in “their” country, thus neglecting the joint nature of the programme.

As part of the Bologna Follow-Up Group's (BFUG) Work Programme 2012-2015, a proposal for a European Approach for Quality Assurance of Joint Programmes has been developed. The proposal aims at facilitating single, integrated quality assurance reviews, by establishing a shared set of criteria and procedures, based on the ESG and the QF-EHEA. Where programme evaluation/accreditation is needed, these should be applied by a suitable EQAR-registered agency, and the result should be recognised in all countries involved.

2.4 Using the European framework within the national system

EQAR was in some cases used as a European reference point by countries in their effort to develop their national quality assurance frameworks and build trust within the system, i.e. national QA agency of Romania (ARACIS) has to fulfil a legal pre-condition of being registered in EQAR in order to operate within the country. Romania was also the first EHEA member to introduce a legal provision, providing higher education institutions with the option to be evaluated by another agency that is listed by the Register (surprisingly, even before EQAR was established). Similarly, other countries have used EQAR registration and ENQA membership as a reference to recognise the EQA activity of their regional QAAs. The regional QA agencies in Spain can receive full powers to conduct the verification of officially recognised degrees, master's and doctorate courses once they have been listed in EQAR

and become a member of ENQA.

2.5 Readiness for cross-border EQA

The openness of national quality assurance systems to other registered agencies is not necessarily a characteristic of a country with a small or larger higher education system (e.g. Liechtenstein vs Malta, or Romania vs. Italy). Neither could particular differences be noted between “open” or “closed” systems in terms of the main focus of quality assurance (institutions or programmes, or both), the level of ‘maturity’ of the QA system, or the EQA approach (supervisory or advisory). Thus, it is rather difficult to point to a certain precondition countries would need, i.e. in their EQA framework to overcome a particular obstacle in allowing their higher education institutions the possibility to choose a QAA fit for their needs.

The study carried out for the European Commission on the Progress in the Development of Quality Assurance Systems (2014) discusses a few of the reasons why countries have a reluctance to allow HEIs to discharge their EQA requirements with a cross-border EQA. If the result of the accreditation has a direct consequence on the funding of the institution, the country may fear loss of control over their publicly funded HEIs. Trusting a QAA to review national criteria is perhaps not done with ease either.

The reluctance to recognise EQAR-registered agencies might be also linked according to some countries to the lack of specific standards and criteria within the ESG, which are often defined at national level,⁵ indicating the countries’ aim to keep this national prerogative. The new proposal of ESG has improved its standards and included closer links to learning outcomes and the European qualifications framework, thus responding to some of these national concerns.

⁵Loukkola, T., (2013) *European Quality Assurance from a European Perspective*, ZFHE Jg.8 / No. 2, p. 9

3. Overview of Cross-Border EQA Activity

To fill the gap and broaden our understanding regarding the external quality assurance (EQA) activities of agencies within different national contexts and legal backgrounds as well as of the main challenges and benefits related to their cross-border EQA activity, a survey has been carried out as part of the research project. The survey considers the activities of respondents who operate within different national contexts (evaluation/audit/accreditation at programme or institutional level), the practices and procedures employed (criteria and processes, publication of reports, follow-up activities, expert team, appeals and complaints procedure etc.) as well as the perceived benefits and challenges by these QAAs that carry out reviews across borders.

3.1 Definitions

To ensure the clarity of the text two main terms have been explained below. For further clarification a list of abbreviation is provided in Annex 2.

Cross-border external quality assurance (EQA) – reviews (evaluation, audit, accreditation) of a higher education institution or a programme in country A carried out by a QAA from country B.

International activities of QAAs – joint projects, cooperation agreements, networking, exchanges etc. carried out by QAAs with partner(s) from other countries.

3.2 Methodology

The questionnaire addressed the existing practices and procedures employed by agencies in their cross-border QA reviews and the rationale for their international activity and other types of international activities (e.g. cooperation with other agencies).

The questionnaire was launched on an online platform (Qualtrics)⁶ and distributed to representatives of QAAs active within and beyond the European Higher Education Area (EHEA). EQAR's database was used to reach out to over 85 QAAs. The questionnaire was circulated in two rounds.

In the initial round (12 February – 20 March) 41 different QAAs responded. In the second stage (15 May – 25 June) an additional 19 QAAs have submitted their answers (see Annex 1). The second round was set up to increase the coverage of QAAs, following a seminar organised for QAAs. The following analysis is based on the responses of 60 QAAs, representing 70% of the total number of QAAs contacted (see Annex 2).

3.3 Profile of respondents

The responses were provided by a wide-range of QAAs established in 30 of the 47 EHEA member countries and in 7 other non-EHEA territories/countries (i.e. Australia, Kosovo⁷,

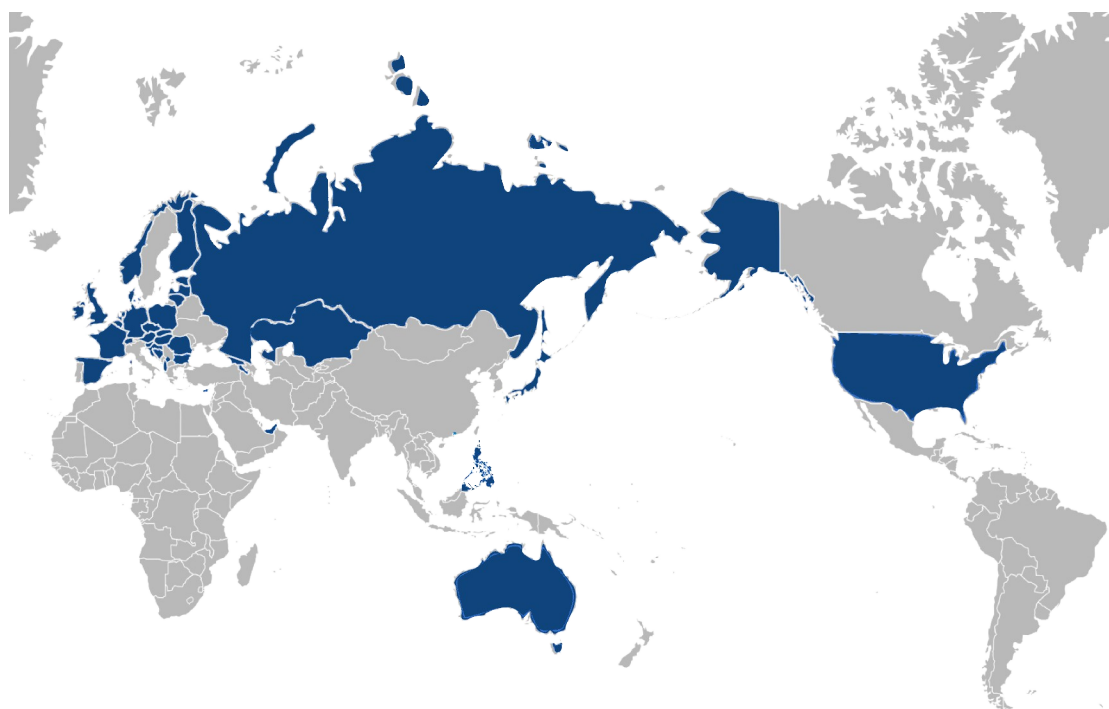
⁶ The PDF version of the questionnaire can be accessed here:

https://eqar.eu/fileadmin/documents/eqar/information/Preview_Questionnaire_-_Cross-border_activity_of_QAAs.pdf.

⁷ All references to Kosovo, whether the territory, institutions or population, on this report shall be understood in full compliance with United Nation's Security Council Resolution 1244 and without prejudice

Hong Kong, Japan, Philippines, United Arab Emirates and United States of America) (see Map below).

Map 2: Countries where QAAs that have completed the survey are based



- Countries where responding QA agencies are based (registered office)
- Countries with no respondents

All EQAR-registered agencies responded to the survey⁸. They represented just over half of the total number of responses (32 out of 60).

While most of the responding QAAs have been established with the purpose of carrying out external quality assurance activities primarily within their country, a specific group of countries or regions, only 7 of the responding QAAs have been set up with the primary purpose of operating internationally (e.g. AEC, EAPAA, ECCE, FIBAA, IEP). Moreover, half (22 of 44) of these nationally or regionally established agencies carry out cross-border EQA activities.

The respondents reflect the diversity of the different EQA frameworks and national specificities. The EQA activities range from institutional audits to evaluation or accreditation for specific disciplines or across different fields of study. A vast majority of QAAs use a combination of institutional and programme level approaches in their national quality assurance systems.

3.4 General overview of international activities

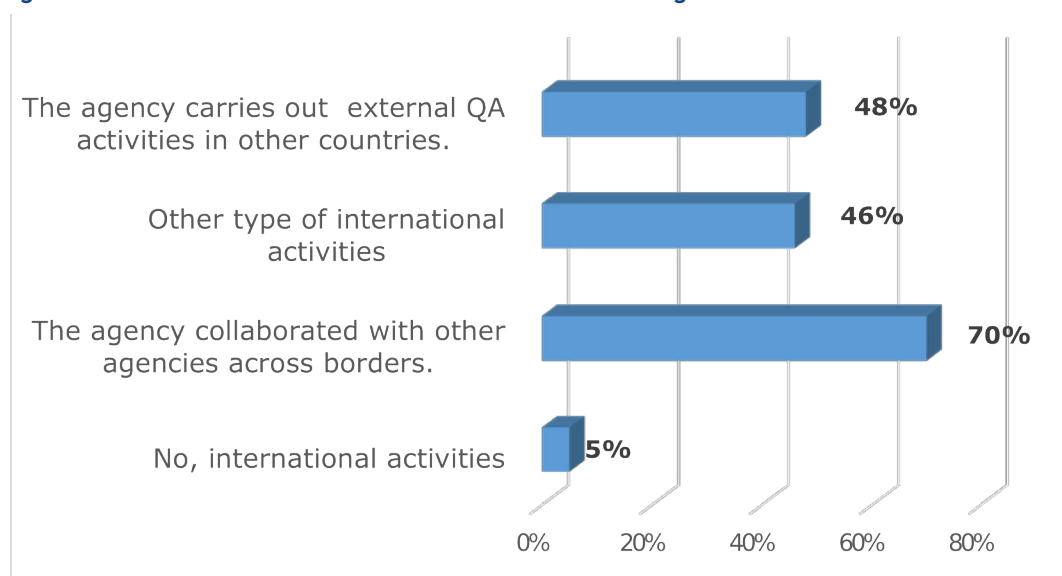
This first overview covers all sorts of international activities of quality assurance agencies (QAAs) in general, while the following parts focus specifically on the cross-border external quality assurance activities (i.e. audit, accreditation or evaluation) of agencies since 2009.

to the status of Kosovo.

⁸ EQAR listed agencies as of 25th July 2014.

Only 3 of the 60 QAAs do not have any type of international activity. Out of the remaining 57 responding QAAs, 70% collaborated at international level with other QAAs, 48% have carried out reviews across borders, and 46% answered that they were engaged in other types of international activities in addition to the previous two possibilities (see chart below).

Figure 1: Overview of international activities of QA agencies



Some QAAs noted specifically that they are not allowed to carry out reviews of HEIs/programmes abroad (e.g. CAA, AI). Their interaction is thus limited to collaboration within the international quality assurance networks or the bilateral/multilateral interactions with other QAAs.

As part of their international activity most agencies have listed international projects (CeQuint, QUEST, Qrossroads, MULTRA, ECAPEDIA, IMPALA, Twinning, NOQA, GICAQ project, QACHE, ESABIH) and involvement in different European (ENQA, CEENQA, ECA, REACU) or other international networks/associations (INQAAHE, ANQAHE).

Within EHEA, 42 of the responding QAAs have reported cooperation across borders with other QAAs. The collaboration seems often to have a more regional concentration that might be related to the similarity of the higher education systems and external QA framework resulting from a shared historical development.

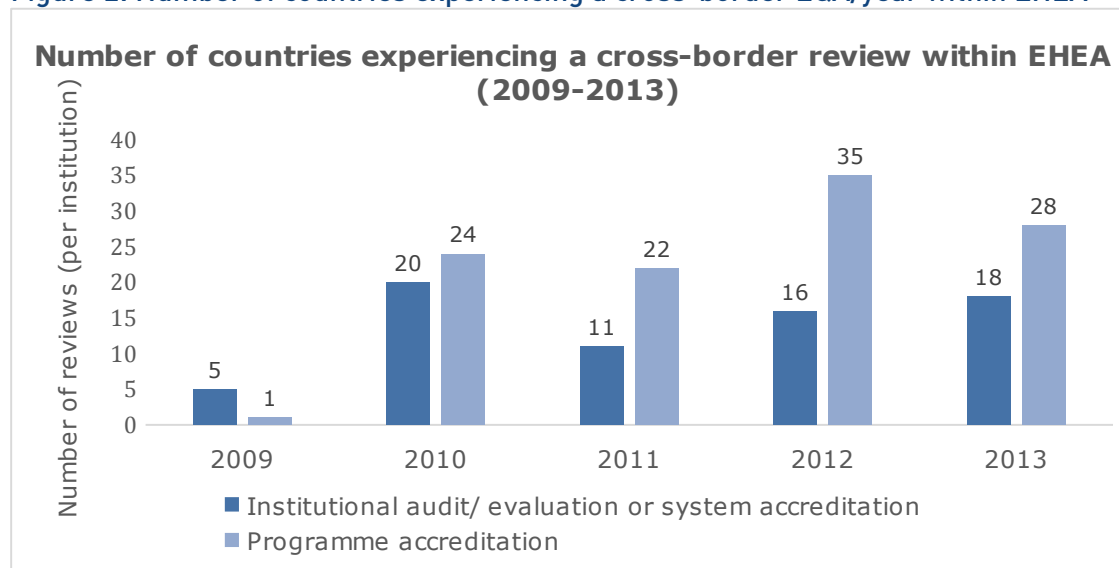
A third of the international active QAAs have established collaboration activities with non-EHEA partners as well. The activities are sometimes initiated by regional or international organisations (Nuffic project in Yemen, GIQAC project funded by World Bank and supported by Unesco, USAID in Ethiopia), they may be a result of strategic alliances set up by an agency (QAA-UK's agreement with Singapore, South Africa, Malaysia, Japan, Hong Kong) or as part of a multilateral agreement to recognise the accreditation of joint programmes (MULTRA project with CNA from Colombia).

Among the reasons for engaging in international activities, QAAs describe the benefit drawn from the exchange of experiences and practices in QA reviews, the possibility of increasing their visibility at the international level, the increased trust, recognition and comparability of diplomas resulting from the collaboration with other QAAs as well as the stimulation of mobility of students and staff.

3.5 Overview of cross-border EQA activities

The following analysis relates only to the replies of the 29 QAAs⁹ that carry out cross-border EQA. Two thirds of these QAAs are listed on EQAR¹⁰ as operating in substantial compliance with the European Standards and Guidelines (ESG), which points to a possible link of QAAs seeking a registration in EQAR and offering EQA activities across borders. Four of these QAAs are established outside the EHEA.

Figure 2: Number of countries experiencing a cross-border EQA/year within EHEA



The figure is constructed based on the responses provided by 23 of the 26 QAAs carrying out cross-border EQA within EHEA. The responses from ACICS, ACBSP and ECTN are not included, as the QAAs did not provide a year of their EQA review. The responses for 2008 and 2014 were excluded also to increase comparability, as agencies were asked to report on the last 5 years in two rounds within 2014.

Between 2009-2013 the cross-border EQA activities of these agencies spanned 39 EHEA and 46 non-EHEA member countries and territories. 26 of the 29 QAAs have been active in these cross borders EQA within the EHEA, carrying out on reviews at institutional or programme level (see Table 2). The activity of these agencies across-countries differ from year to year (e.g. IEP carried out institutional evaluations in 5 different EHEA countries in 2010, 11 different EHEA countries in 2011 and then dropped to 5 countries in 2012). The number of reviews however seems to increase within a country, with about half of the QAAs returning for a review within that country in the following years.

Table 3: Number of countries experiencing cross-border EQA (2009-2013) within and beyond EHEA

	EQAR-registered agency	Non-EQAR registered agencies	Total
Within EHEA	19	5	26
Beyond EHEA	15	6	21

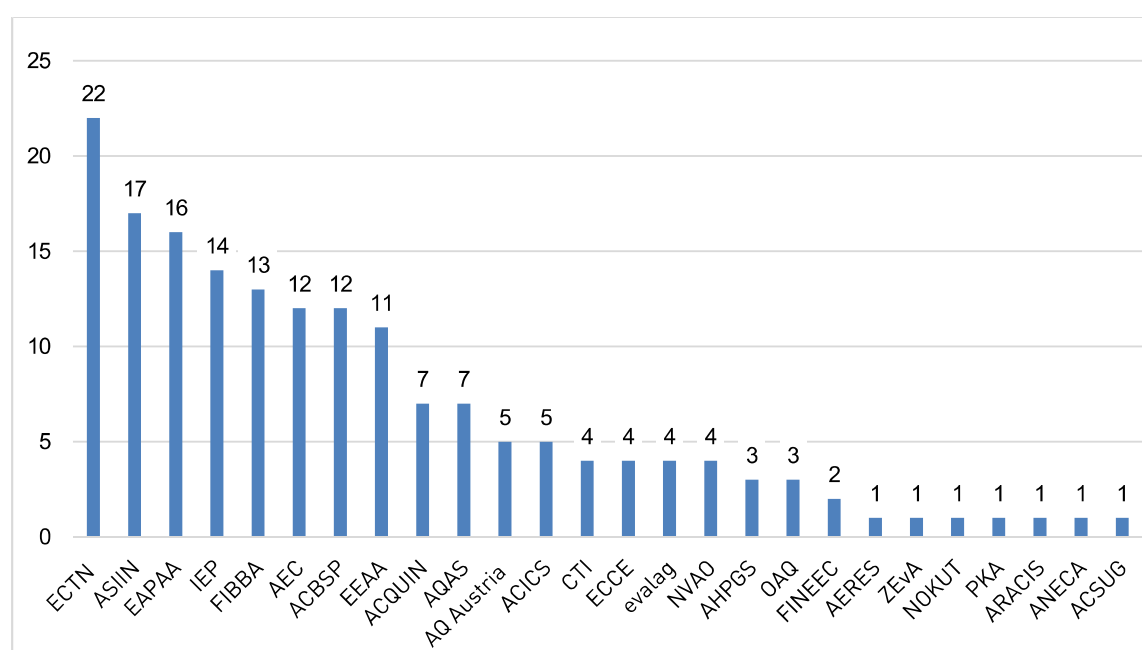
⁹ Non-EHEA respondents carrying out reviews across-borders: ACBSP, ACICS, PAASCU, TEQSA.

¹⁰ EQAR listed agencies as of 23rd July 2014.

The reviews tend to have a European concentration (see charts below) as 92% of respondents come from EHEA. The highest number of reviews are carried out by European QAAs who have an international orientation (e.g. ECTN, EAPAA, IEP). These reviews vary depending on the level (institution, programme level), type (accreditation/audit/evaluation) and external QA framework (open or not open to cross border QA reviews¹¹).

Figures 3 and Error: Reference source not found do not include the total number of QAAs' reviews across borders, due to the high disparities of the type of the cross-border review and QAA answers. To ensure comparability the charts below present the number of countries (other than their own) where QAAs have carried out a review between 2009 and 2013.

Figure 3: Number of countries within the EHEA in which QAAs have carried out cross-border reviews (2009-2013)



The cross-border reviews are widely ranging in their aims and approaches. While some reviews are carried out periodically with the purpose of awarding a label within a specific field (such as Eurobachelor®, Euromaster® offered by ECTN, or Eurochemistry; EUR-ACE¹², EUR-inf offered by ASIIN) others are initiated with the purpose of accrediting a type of educational establishment (e.g. ACBSP providing accreditation for business schools, EEAA for evangelical schools, ECCE for chiropractic schools). National (or bi-national) QAAs have also developed in recent years cross-border EQA activities (e.g. AQ Austria since 2013, AHPGS since 2009, ACQUIN since 2006, evalag since 2012, FINEEC since 2013, NVAO¹³ since 2010, OAQ since 2010, ZEvA since 2011) (see Figure 2 and Figure 3). These reviews were not limited to a particular field of study but more wide-ranging, usually based on their previous national EQA experience.

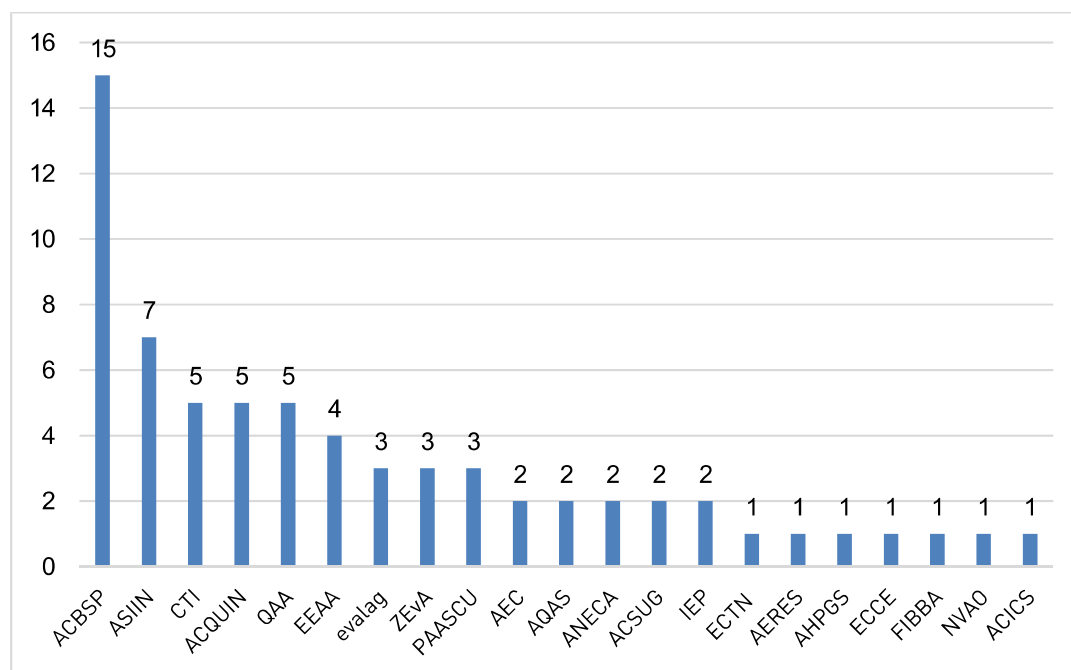
¹¹ We refer here to the obligatory external evaluation or accreditation, i.e. fulfilling the requirements set out within the national legal framework for higher education institutions and/or at programme level.

¹² The EUR-ACE® label is a certificate awarded to engineering degree programme by a number of authorised agencies (ASIIN, CTI, Engineering Council UK, Ordem dos Engenheiros etc.)

¹³ The cross-border EQA activities carried out by NVAO, does not include here the reviews undertaken in Netherlands and Flanders. Since from its foundation in 2005 NVAO has assessed and accredited around 4500 programmes in both of these higher education systems.

These results point to an increasingly dense web of external reviews across borders.

Figure 4: Number of countries beyond the EHEA in which QAAs have carried out cross-border reviews (2009-2013)



3.6 Status and recognition of EQA

The status and recognition of cross-border EQA activities in the country of the reviewed institution or HEI's programme depends on the national legislation or regulations and purpose of the review.

In some cases higher education institutions can discharge the legally required EQA procedures (see chapter 2 for details), while in other instances the review was undertaken on a voluntary basis in order to gain an additional external feedback (evalag review of an institution in Hungary) or a quality label (EUR-ACE label awarded by ASIIN, Premium label offered by FIBAA). The cross-border EQA can be also a result of a cooperation of the QAA with the nationally recognised QA body (AEC collaboration with ANQA, ZEvA, SKVC etc.) in which case the decision regarding the accreditation is taken by the national QAA.

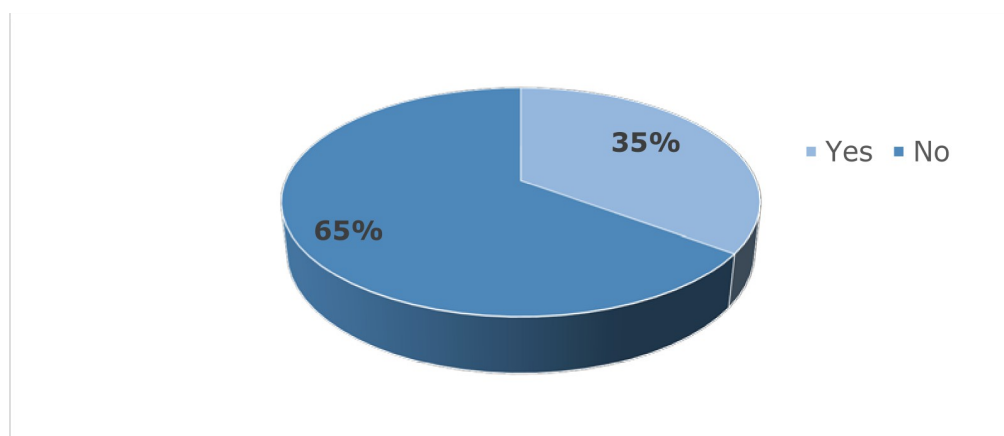
In three fourths of cases the cross-border external QA activity within the EHEA was initiated by the higher education institution, while reviews commissioned by ministries were less common. Examples of Ministry initiatives are the request launched by the German Community of Belgium to AEQES for the evaluation of some of its HE programmes, the Ministry of Education from Moldova contracting ARACIS for the review of its Law study programmes, or the IEP evaluations in Romania and Portugal.

3.7 Criteria and processes used in cross-border EQA

Only 35% of surveyed QAAs that carry out cross-border EQA have responded that they have established and published specific policies or procedures for these type of reviews (see Figure 5).

The responses also indicate that 65% of QAAs would operate on the basis of the policies initially designed for national EQA or on an ad-hoc basis.

Figure 5: Agencies' specific policies regarding cross-border QA review



QAAs were further asked about details regarding the **criteria and processes** used during their reviews abroad, the criteria for decisions and formal outcomes (a), composition of the expert group (b), publication of reports (c), appeals or complaints procedure (d) and the agency's follow-up activities (e).

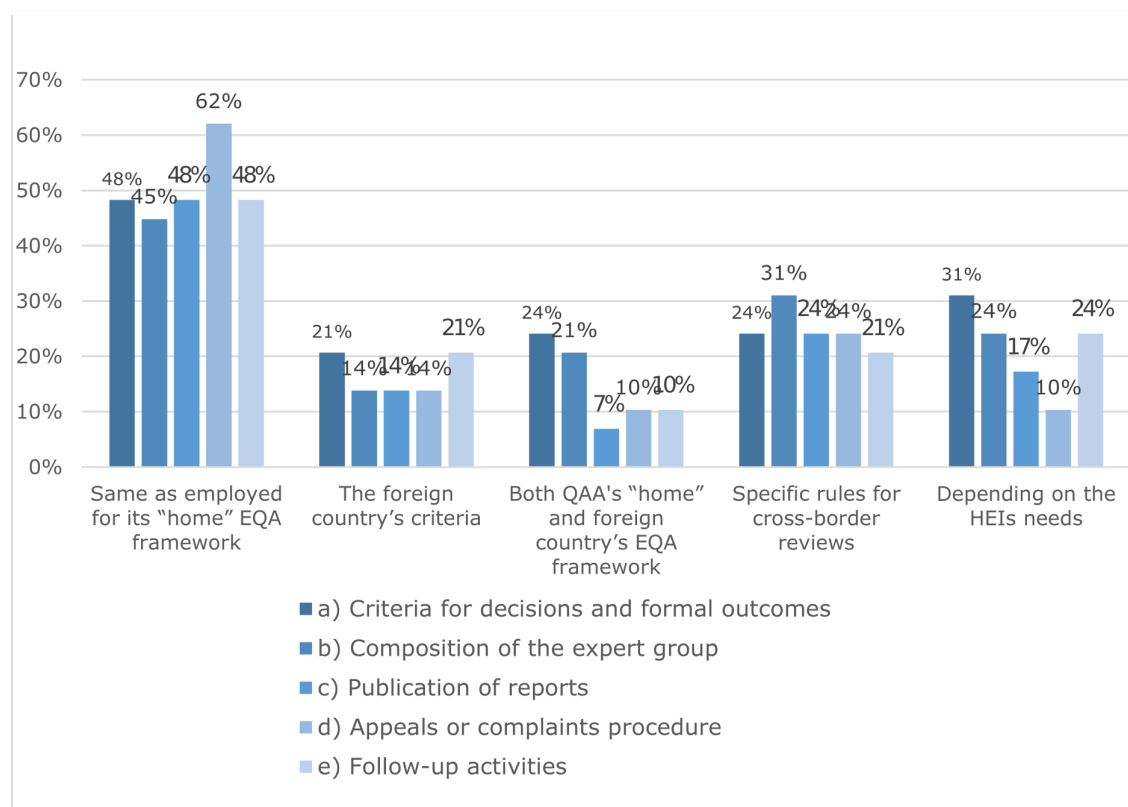
The results show that:

- over half of the agencies carrying out cross-border EQA change their practices when they go abroad (see above chart);
- a fourth to a third of these agencies adapt their criteria if needed, according to the requirements within the foreign country;
- at the request of the higher education institution 1/3 of QAAs changed their criteria for decisions and formal outcomes, 1/4 the composition of the external review panel and their follow-up activities;
- 17% of QAAs declared they have not followed their usual practice on the publication of reports.

The fact that most agencies have chosen more than one answer in all given dimensions shows the diversity of approaches to cross-border EQA. These results generally point to a significant degree of adaptation of EQA practices when carrying out reviews abroad.

Within the country of the reviewed HEI (see chart below), 42% of the responding QAAs have contacted the responsible ministry and 69% the national QAA. This was done, for instance, to discuss the need to incorporate additional criteria (required by the national authorities), to set up the terms of reference of the review process or to clarify the specific requirements for the official recognition of the programme.

Figure 6: Criteria and processes in cross-border EQA



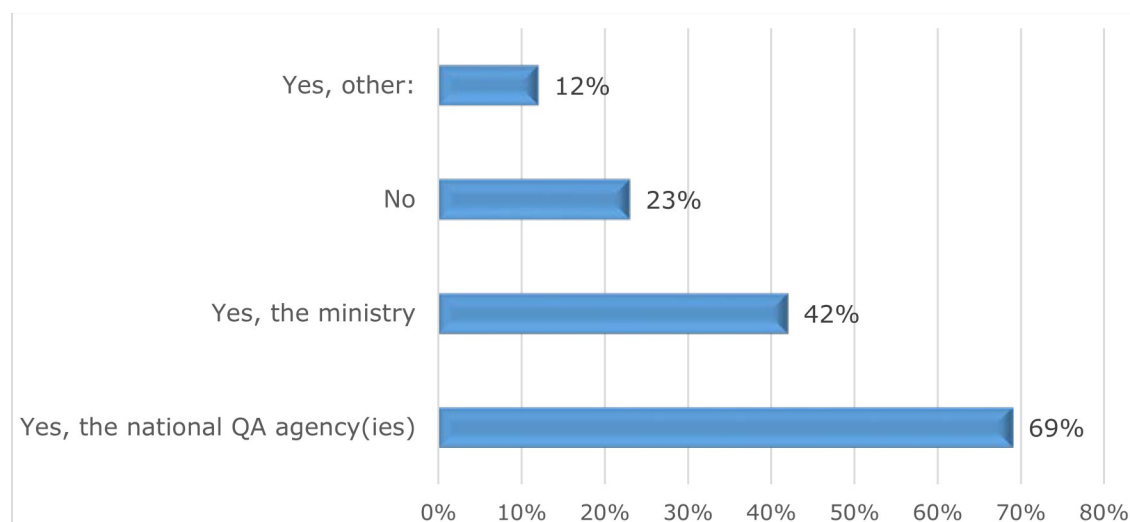
3.8 Benefits and challenges observed by QAAs

Quality assurance agencies described as the main **benefit** of their EQA activity within other countries the following:

- the opportunity to improve their own processes and methodologies, through observing and reflecting on how well they can be deployed in a different system.
- Possibility to expand their own network;
- increasing their national and international profile;
- opportunity to promote continuous improvement within their expert pool;
- ensuring transparency and comparability within the field of EQA;
- increasing their flexibility and adaptability to other national systems;

As main challenge QAAs mentioned the need to adapt and familiarize themselves with the regulatory framework, context and customs of the “target” country was difficult. QAAs need to invest considerable time and effort before operating in a country for the first time. Agencies have described this as particularly difficult for cases where regulations on the work of foreign agencies were unclear or not transparent.

Figure 7: Contact with HE competent authorities in the country of the reviewed HEI



Further challenges observed by quality assurance agencies in their cross-border EQA activities include:

- overcoming language barriers;
- finding suitable peers for the review;
- acquiring the necessary regulatory documents regarding the national EQA framework in English or their own language;
- deciding on what set of standards to apply;
- managing different expectations in terms of content and style of reports, especially where another agency needs to make a decision on their basis.

To overcome these barriers, QAAs have approached national authorities and/or local QAAs (see above) to clarify the requirements of the national EQA framework and ensuring mutual trust. In order to address language barriers, some QAAs have included a native speaker within the external review team or arranged for simultaneous translation for their panel meetings.

3.9 Measures to facilitate the EQA activities across borders

The survey also invited QAAs¹⁴ to provide suggestions how to facilitate the EQA activity of agencies abroad.

At the international level agencies suggested:

- Promoting the European Standards and Guidelines (ESG) as the core element of trust and recognition within the EHEA, including EQAR-registration as a reference

¹⁴ The question was addressed to all 60 surveyed QAAs

for cross-border EQA review;

- Promoting the use of standardised information on each country's requirements for cross-border reviews to facilitate QAAs first contact with that country;
- Dissemination of results from cross-border reviews;
- Establishing and agreeing on trans-national quality seals and common policies for the publication of evaluation reports;
- Development of specific procedures/policies for the recognition of accreditation decisions of joint programmes;
- Direct financial resources to QA agencies to support international quality assurance activities and reviews;
- Organisation of international benchmarking seminars;
- Developing a data-base of international experts;
- Developing regulation to prevent the negative effects of a possible "marketisation" of QAAs activities across borders.

At the national level agencies suggested:

- Ensuring a more flexible and transparent national regulation for the work of foreign QAAs but also recognition of their accreditation.
- Making available national rules and criteria in English;
- Encouraging national agencies to cooperate with field specific international QAAs;
- Raising awareness on the benefits of recognising the diversification of QA practices and removing the strains for HEIs that are duplicating these reviews;

4. Higher Education Institutions' Experiences with Cross-Border EQA

This section presents the experiences by HEIs, gathered from a series of case-study interviews. The interviews addressed the rationale for cross-border reviews, the experiences made and the impact observed by HEIs.

4.1 Case study methodology

To understand the dynamics of institutional experiences a multiple-case study research was developed. This research method facilitates the exploration of similarities and contrasting results when looking at different institutional environments.

By “institutional experience” this paper refers to the perspective from inside a higher education institution (as opposed to the perspective of a QAA or an outside stakeholder), and the term is used irrespective of whether the review was carried out at the level of the entire higher education institution, a faculty or at the programme level.

Sampling countries and higher education institutions

In selecting the case studies the diversity of the external quality assurance (EQA) frameworks and approaches was taken into account.

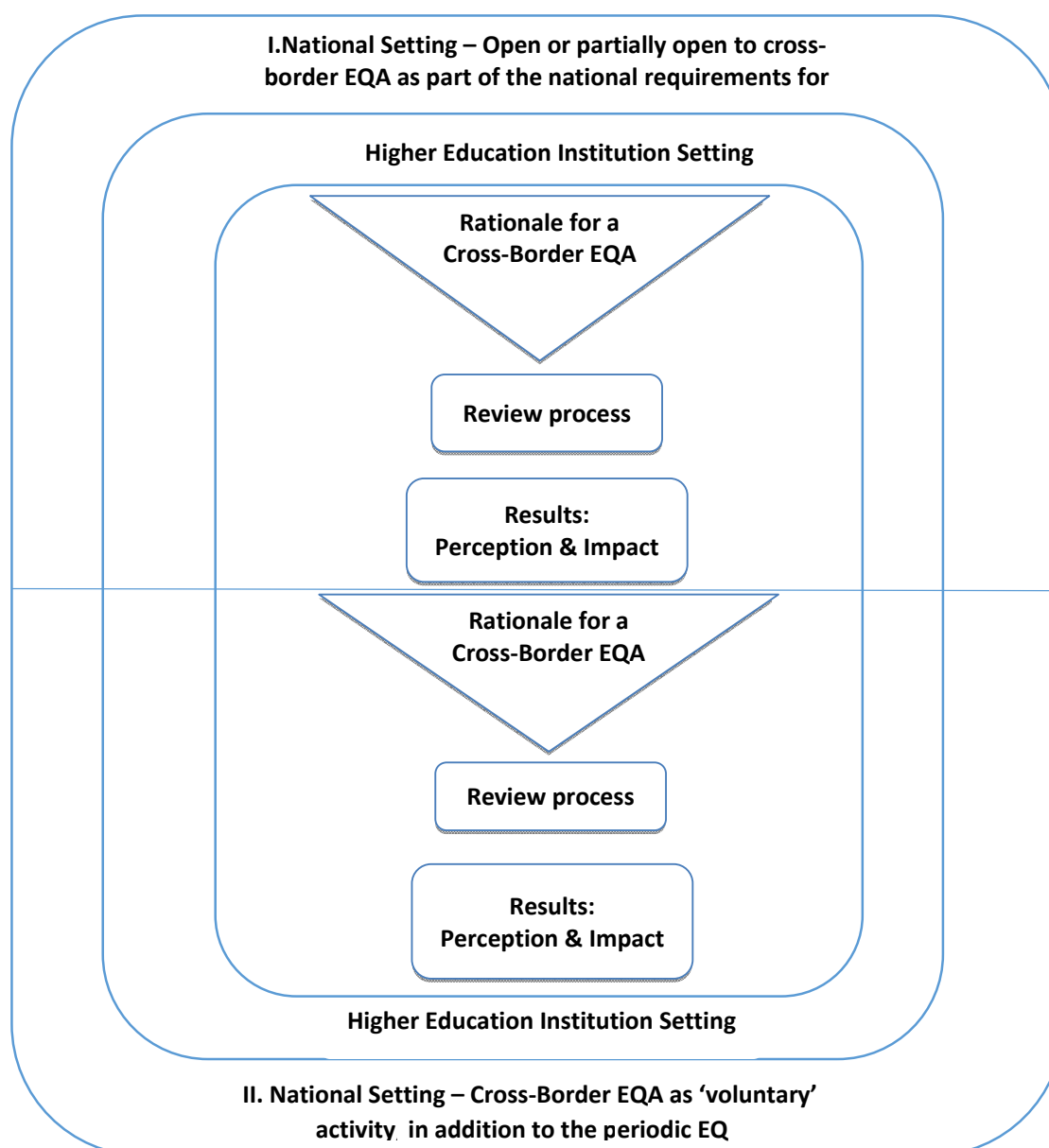
The countries (in the case of Flanders: community) were selected with the aim to represent a geographically balanced sample and to provide a relevant mix of quality assurance frameworks across the EHEA¹⁵. To achieve this heterogeneity, national higher education frameworks were selected based on the differing characteristics of their QA systems (openness to cross-border reviews, stage of development of the external QA system, diversity in terms of outcomes of QA reviews) and geographical balance.

Two groups of countries differing in one main characteristic of their national higher education settings were selected as follows:

- I. 8 case-study interviews in 4 countries that recognise EQAR-registered QA agencies as eligible to satisfy the official requirements for external QA and
- II. 4 case-study interviews in 4 countries where cross-border EQA is being carried out on a voluntary basis, in addition to the periodic obligatory external review.

¹⁵ Due to funding eligibility criteria set out under the Erasmus Networks, accompanying measures project, only countries belonging to the Lifelong Learning Programme (LLP) of the European Union could be selected. See full list of LLP Countries here: http://ec.europa.eu/education/tools/docs/llp-national-agencies_en.pdf

Figure 8: Design of the study and conceptual framework



Similarly, the selection of HEIs was made taking into account the diversity of EQA experience with a cross-border review (i.e. programme and institutional reviews as well as joint or double degree programmes) and the representativeness of the HEI within the national QA system (whenever possible).

The case study interviews were conducted at institutions where EQA has been carried out with EQAR listed agencies. There were two distinct exceptions; EFMD’s institutional accreditation under the EQUIS label carried out in 2014 at the University of Lund (Sweden) and the IEP review carried out in 2007 at the University of Aveiro (Portugal). IEP was later included in the Register but at the time of the review, EQAR was not operational. The EFMD review was chosen to provide a different perspective (I) for carrying out a review across borders with an EQAR-registered agency.

The final results of the selection are presented below:¹⁶

¹⁶ See Annex “Selection of countries for the study case” for further information regarding the criteria for the selected countries.

- I. Higher education institutions from 4 countries that recognise reviews of foreign EQAR-registered agencies as part of the national requirements for external QA (National setting I):

Austria: Universität Wien (OAQ, quality audit 2013), University of Graz (FINHEEC, institutional audit, 2013)

Belgium: Flemish Community (BE-nl) Ghent University (AQAS Joint degree accreditation, 2012/2013) & Royal Military School (CTI & NVAO joint review, 2011)

Lithuania: VTDK University (evalag, programme accreditation 2011); Mykolas Romeris University in Vilnius (AHPGS, programme accreditation 2011)

Romania: University of Bucharest (IEP evaluation, 2012) & Dimitrie Cantemir University from Targu Mures (AHPGS, programme accreditation, 2012);

- II. Higher education institutions from 4 countries that do not recognise (or are in progress of recognising) cross-border reviews (National setting II):

Croatia: University of Zagreb (ASIIN, Faculty of Electrical Engineering and Computing, accreditation 2013 and Faculty of Civil Engineering, programme accreditation 2013);

France: Centre d'Etudes Supérieures Européennes (CESEM) at NEOMA Business School (FIBAA, accreditation of a double degree, 2011) ;

Sweden: University of Lund (Lund School of Economics and Management - LUSEM, EFMD accreditation, 2014);

Portugal: University of Aveiro (IEP evaluation, 2007).

Design of the study and conceptual framework

A conceptual framework was designed to guide the case-study research questions on the institutional experience with a cross-border EQA. The research questions focus on the rationale for a cross border review, the specificities of the review process, the institution's experience and the impact of the review. The same general line of questioning was used in both national settings, to gather a comparative perspective.

Data collection methods and instruments

Semi-structured interviews have been carried out with key representatives and stakeholders of each higher education institution (i.e. leadership, coordinator of the institutional/programme EQA, representative of the QA department, QA council, student representatives, management). Following the interview a report summarising the main findings for each case study was prepared. The reports of the review were checked for factual inaccuracy or possible misinterpretation by each of the interviewed institutions.

The confidentiality of the specific information provided was ensured to interviewees so as to allow disclosure of possible critiques and to increase openness.

Case-study research questions

In order to facilitate a systematic comparison of cases, a common set of research questions was developed. The interviews were, nevertheless, contextualised within their different national settings (NSI & NSII). In addition, specific questions have been added

according to the particularity of the review (e.g. double/joint degree programmes).

The main research questions for the case studies are presented in the following table. The questions were not used as a pre-set check-list but, rather, as a set of thematic guidelines. To some extent the sections might overlap due to the similarities among the researched elements.

Table 4: Case-study research questions

Research dimension	General Questions	Specific questions
Description of the institutional/programme review	<ul style="list-style-type: none"> When was the QA review carried out? What type of QA review was carried out? 	
The rationale for the review	<ul style="list-style-type: none"> Why has the HEI turned to a non-national QAA? Is this the first experience with a cross-border EQA? Was the institution responsible for selecting the QAA? If so, how was the selection process organised? If not, how was this decision made? 	<ul style="list-style-type: none"> <i>NS1</i>: Has the institution also carried out an external review with a national QA <i>Joint/double degree</i>: Was a consultation process set up with the partnering institution(s) for selecting the QAA?
The review process	<ul style="list-style-type: none"> What were the main criteria for the selection process for the QAA? (e.g. International profile, expertise in a specific field/discipline, affordability, reputation, better recognition of degrees abroad, methodology approach (best support in enhancing our QA), country of origin, working language, other). 	<ul style="list-style-type: none"> <i>NS2</i>: Why didn't the HEI select a national QAA for the review?
Results: perception and impact	<ul style="list-style-type: none"> What did the HEI find noteworthy (and different from what it is used to) in terms of how the agency worked? (e.g. composition of panels, drafting/style of reports, conduct of interviews, sort of people to be interviewed) What were the main impressions regarding the external QA review? What were the main challenges encountered? At what level? How were they overcome? 	<p><i>NS2</i>: Would the HEIs choose a QAA that is active across borders to fulfil the official requirements for external QA if the possibility existed?</p>

- What were the main benefits of the evaluation? / Did the HEI get what it had hoped for from this process? / Would the institution be interested in contacting the QAA for another review?

4.2 Overview of case studies

The analysis of institutional experiences with a cross-border external quality assurance (evaluation/accreditation/audit at institutional level or programme level) has been depicted in the cross-case synthesis presented below. The contacted institutions have been asked whether they carried out any additional cross-border EQA activities with an EQAR or non-EQAR registered agency. The additional cross-border reviews have been considered within the initial analysis as they complement the general findings and provide a more comprehensive overview of the cross-border experience. A table with the overview of all cross-border EQA activities reported upon by the 12 interviewed institutions is presented below.

Table 5: Overview of case studies

Level	QAA & Type of review	HEI discharging the national requirements for EQA with a foreign QAA	HEI carrying out a 'voluntary' EQA (in addition to the EQA requirements) with a foreign QAA
Programme or faculty level	ASIIN (programme accreditation) <ul style="list-style-type: none"> • EUR-ACE® seal • Euro-Inf® seal 		University of Zagreb (Faculty of Electrical Engineering and Computing & Faculty of Civil Engineering) ¹⁷
	ACQUIN (programme accreditation)		University of Graz
	AHPGS (programme accreditation)	VTDK University <u>Mykolas Romeris University</u> Dimitrie Cantemir University	
	AQAS (joint degree accreditation)	University of Ghent (EMBC – Master)	
	CTI & NVAO (joint review)		Royal Military Academy
	EEALS (joint degree	University of Ghent	

¹⁷ Separate interviews were conducted with the two faculties.

At institutional level	accreditation)	(IMRD-ATLANTIS Master)	
	EAEVE (programme accreditation)	University of Ghent (Faculty of Veterinary Medicine)	
	EAPAA (programme accreditation)		University of Bucharest
	EFMD (Faculty accreditation Equis label)		University of Lund (Lund School of Economics and Management)
	evalag (programme accreditation)	VTDK University	University of Graz & Graz University of Technology (joint degree)
	FIBAA (joint degree accreditation)		CESEM at NEOMA Business School (Reims)
	FINEEC (audit)	University of Graz	
	IEP (institutional evaluation)		University of Aveiro University of Bucharest
	OAQ (audit)	University of Vienna (ongoing)	

National contexts of case studies

The reviews were carried out with the purpose of a programme accreditation (Romania, Lithuania), an institutional audit (Austria) or as part of a joint programme¹⁸ accreditation (Belgium). The following reviews were all recognised as part of the initial or periodic EQA requirements:

- Higher education institutions in the **Flemish Community of Belgium** can have the review for their programme accreditation carried out by foreign agencies. This review will be the basis for accreditation of the study programmes by the NVAO. All EQAR-registered agencies are entitled to carry out the assessment reviews, but have to agree to the Terms of Reference with NVAO beforehand.
- To carry out a review with a foreign QA agency in **Lithuania**, the institution must launch a public call for tender, in conformity with the “Procedure for the external evaluation and accreditation of study programmes”, issued by the Minister of Education and Science. The call includes a short description of the study programme(s) to be accredited (e.g. cycle, study area, field), the requirements and criteria for the external evaluation (i.e. evaluation scale), the time frame of the review process as well as some specific requirements from experts (e.g. qualified

¹⁸ A programme offered jointly by different higher education institutions irrespective of the degree (joint, multiple and double) awarded.

specialists in the area of study). The law specifies that the external evaluation may be performed by a foreign agency included in EQAR, while the national QA agency will take an accreditation decision on the reviewed study programme. The two universities selected as case studies are the only two Lithuanian institutions that had programmes reviewed by a foreign agency.

- In **Austria**, there is no requirement for a public procurement procedure, unless the cost of the review process would exceed EUR 50 000. Public universities have to undergo an audit of their internal quality assurance system periodically every seven years and can choose to have that audit carried out by the national agency (AQ Austria), a suitable EQAR-registered agency or another agency recognised by the ministry responsible for higher education. The universities of Graz and Vienna are two of the other public universities that opted for a review by a foreign agency (Uni Wien, Uni Graz, WU Wien, VetMed Wien, Innsbruck, Leoben).
- **Romanian** higher education institutions can choose for their programme accreditation and periodic institutional evaluations the national agency (ARACIS) or another suitable EQAR-registered agency. The external review body must however comply with the national regulation and other international field related standards.¹⁹ Although the procedure for a cross-border EQA with an EQAR-registered agency seems straightforward, there has been some uncertainty as to the practical application of that legal provision and there is currently only one example of such a review carried out in Romania.

Having access to specific funding streams to cover the cost of an international accreditation, the institution was more likely to choose an EQAR-registered agency (i.e. VDTK, Lithuania).

The following reviews were undertaken “voluntarily”, i.e. in addition to the obligatory national reviews. The “voluntary” type of reviews carried out in both national settings (NS1 & NS2) are most often improvement-led as they have no consequence for the public funding or accreditation of a study programme.

- **Croatian** higher education institutions are subject to different types of external quality assurance organised by the national Agency for Science and Higher Education (ASHE, Croatian acronym: AZVO). Public universities are self-accrediting as regards their study programmes, but subject to an institutional audit and re-accreditation. Even though called “re-accreditation of higher education institutions”, these actually refer to separate faculties. Evaluations, accreditations and audits carried out by foreign quality assurance agencies are done in addition to the obligatory national reviews, but are not recognised to replace or form part of the national external quality assurance framework.
- In **France** the authority to confer degrees is granted and renewed by the Ministry of Higher Education and Research. The certification (“habilitation”) is offered after reviewing the application presented by the institute in question. The review is usually done by the national quality assurance body, AERES which is in charge of institutional evaluation, research unit evaluation and bachelor, master and doctoral

¹⁹ Law no. 87/2006 for the endorsement of the Government’s Emergency Ordinance no. 75/2005 concerning quality assurance in education.

programme evaluation. However, when it comes to evaluating engineering programmes, the review is carried out by CTI (Commission des Titres d'Ingénieurs).

- The quality assurance system for higher education in **Portugal** was set up by the Rectors' Council in 1990 and comprised of different coordination councils who assessed the quality of the public, private and polytechnic sectors. After the system was reformed in 2007 the national Assessment and Accreditation agency, A3ES was assigned to accredit study programmes in a five-year cycle. In addition, since 2012 A3ES has started quality audit procedures as a pilot exercise. The institutional audit is to be fully implemented in 2016, after the first accreditation cycle is completed. The results of the assessment or accreditation procedures requested by Portuguese higher education institutions from other national or foreign quality assurance bodies may be recognised depending on the protocols of agreement and decision of the Executive Board of A3ES.
- In **Sweden** the authorisation for public institutions to carry out programmes leading to a degree-level award is provided by the national agency (with the authority of the Ministry) following a review. The national agency (HSV) also carries out the periodic evaluations of programmes. For a positive programme accreditation, the decision is valid for four years. Reviews carried out by foreign quality assurance agencies (QAAs) cannot replace the periodic reviews of HSV and are carried out on a voluntary basis.

4.3 The rationale behind a cross border EQA

Higher education institutions turn to an agency active across borders not only to fulfil their periodic EQA requirements, but also to enhance their reputation, increase the employability of their graduate or to develop their own internal quality culture. Institutions referred to the following main reasons when asked about their rationale for a cross-border review:

Increasing the international visibility and reputation

In most cases the institutions sought to increase their international visibility and reputation of their programmes with the aim of gaining a “competitive advantage”:

- Considering the international profile of business schools and research-oriented institutions, the decision to carry out a review is to enhance the institution's profile internationally and as a result extend its partnerships and collaborations within the network. A high number of international partnerships (e.g. bilateral agreements, educational and research programmes, networks and research collaboration) are supported with this type of accreditation.
- Small and regionally-focussed higher education institutions consider the recognition provided by an international accreditation body as a way of attracting more students not only from the national pool but also from outside the country.

Achieving “Bologna-compatible” degrees

The decision to carry out the review was set in the context of the Bologna Process reforms. A few of the interviewed institutions saw the international accreditation agency as a way to make their studies more attractive for the labour market by having their programmes and qualifications recognised/certified as “Bologna-compatible” and in line with European

standards. This was mainly the case where the national QAAs were not yet established or had not yet been reviewed against the ESG.

Development of institution's quality culture

More than half of the selected institutions have carried out at least two external reviews with a QAA active in cross-border QA, either at the programme or institutional level. The interviewees saw these external evaluations/audits as contributing to the development of their internal quality culture. Building upon the experience of previous reviews the institutions found that they had improved their internal quality arrangements (better developed structures and processes) and approach to internal quality.

Development of institution's management and organisation

One institution sought external expertise to develop the strategic goals of the institution (e.g. assess less developed areas of the university, enhance its research infrastructure, regional development etc.). This institution placed a high emphasis on the recommendations of the external review panel, as essential in consolidating the institutional development goals.

In the context of national reforms

EQA activities were at times commissioned by ministries to implement a larger higher education reform agenda. One of the selected case studies was reviewed as part of a national EQA exercise (2012-2014) carried out for the project "*Performance in Research, Performance in Teaching - Quality, Diversity, and Innovation in Romanian Universities*" co-financed by the European Union's structural funds and implemented by UEFICDI²⁰ and EUA's Institutional Evaluation Programme (IEP). Within the framework of the project, IEP carried out 70 reviews of public higher education institutions during three rounds of evaluation (between 2011 and 2014). The project was set to improve the management and quality assurance within the Romanian higher education system by strengthening the strategic capacity and autonomy of universities. Additionally, the project sought to provide the Ministry with an independent international opinion on which to base its future strategic decisions regarding institutional development.

Accreditation bodies of regulated profession

Although these cases were not the focus of the case studies, one institution reported that some of their programmes had undergone an international accreditation to fulfil the required educational standards for specific EU regulated professions. For instance, the Faculty of Veterinary Medicine (University of Gent) reported that it has to comply with a number of standards in the preparation of veterinary surgeons, since the profession is regulated by the European Union directive (Directive 2013/55/EU). The EAEVE review provides a recognition for veterinary education establishments if they have achieved the EU minimum compulsory requirements for this profession.

Seeking a different EQA review or approach

Some institutions decided to commission a non-national QA review for its study programme because it was dissatisfied with the approach or methodology of the review carried out by the national QA agency, or did not consider that that agency understood the institution and its work sufficiently well.

²⁰ Executive Agency for Higher Education, Research, Development and Innovation Funding.

4.4 Selection of a suitable QAA

Institutions considered a number of criteria that played a role in the final selection decision (international reputation, country of origin, expertise in a particular field, affordability etc). In some cases no initial decision was taken to choose a foreign or a national QA agency, and both options were considered equally.

The choice of a suitable agency usually involves considerable desk research for higher education institutions, for which institutions have used information provided on the EQAR website (e.g. expertise in different methodologies of external quality assurance, countries where agencies have worked) and on the agencies' own websites. Institutions often find themselves in the situation that only a small number of the (currently) 32 EQAR-registered agencies²¹ would at all be suitable to undertake the review that is needed.

Fulfilling the legal requirements

A pre-condition for choosing a QAA in the case of higher education institutions seeking to discharge their external QA obligations was to only consider QAAs that fulfilled the national legal provisions. QAAs active in cross-border QA were required to have expertise in a certain type of EQA (audit/accreditation/evaluation). In many cases, agencies are also required to use a national set of criteria. This gave an advantage to those agencies with prior experience in the country or those that could articulate clearly how they would carry out the review in the specific country.

Language

Among the selected institutions the most common language of the international QA review was English. In a few cases, institutions requested German, French and Dutch as the main language of the QA review process. The requirement to carry out the EQA in the official language of the country was either an internal decision (in case of bilingual institutions) or it was requested to ensure a more efficient review process, to reduce the possibility of misinterpretation in the use of technical terms and to increase the acceptance of the review among internal or external stakeholders.

International experience and expertise

Due to the international dimension of the degree programmes, in particular in the case of Erasmus Mundus and other joint and double degrees programmes, institutions were considering QAAs that could have an international-led approach in reviewing the quality of the programme. Institutions mentioned they also looked at the portfolios of international activities and at the presentation of QAA's procedures and cross-border review policies.

Peers

The institutions preferred QAAs with a wide and multi-national pool of experts, and some had asked for panel members with expertise in a given field. In two cases the institutions requested the international QAA not to include experts from within their country. Due to a limited pool of national reviewers, the higher education institutions feared the biased view of experts coming from one of the 'competing' higher education institutions.

One of the institutions mentioned they were dissatisfied with the lack of training requirements for specialists used by one of the reviewing agencies (a non-EQAR registered

²¹ EQAR listed agencies as of July 2014

agency).

Costs

For some of the interviewed institutions (large and mature HEIs) costs did not play a major role, even though the institution relied on its own budget to cover the review cost. These institutions noted that the internal costs (preparation, self-evaluation, etc.) were anyway significantly higher than the cost of the review as such. The situation was different for those institutions that had to launch a public call for tender.

Most institutions recognised that the costs of a cross border review were higher than the costs of a review by the national QA agency, which might deter institutions in seeking a cross-border EQA. The choice of a cross border EQA is taken because the (long term) benefits are considered to outweigh the higher costs of such a review.

4.5 Benefits and impact of a cross border EQA

Internationalisation and recognition of degrees

Institutions felt that a review by a foreign international agency was a more genuine international experience, even if the national QA agency would include international peers on its panels. This is mainly based on the perception that the chosen agency has a broad pool of international peers and would be clearly seen as international by their stakeholders. Also, international review teams are considered to have a more developed understanding of the programme complexities and the institution's experience with international students.

The most widely acknowledged impact of a cross-border EQA review was the strengthening of internationalisation policies and development of institutions collaboration with other foreign institutions. The internationalisation effect also extended to the academic formation practices (teaching and learning) of the institution and the development of mobility programmes.

The cross-border EQA reviews seem to also support the implementation of Bologna tools. For instance, to meet the requirements of a programme accreditation, the reviewed institution reported to have aligned its study programmes to the European Qualifications Framework (EQF), making the transition the national qualifications framework (which was later established) more easily.

In comparison with the national reviews some of the interviewees from small higher education systems considered the international/foreign panel of experts to be more balanced in its judgements and review of their programmes.

Stakeholder engagement

In preparing the review process the institutions engaged in a wide consultation with their academic communities. This has enhanced the participation of stakeholders in the development plans of the institution and reviewed programmes. The cross-border EQA review is sometimes seen to have enhanced the voice of students within the institution as well, increasing the recognition of their input. One of the institutions reported that it decided to include a student representative within the self-evaluation committee for the first time.

Interviewees also reported an increased external acknowledgement of the institutions' efforts to improve from the local community and enhanced collaborations with their alumni and social partners.

Development of QA practices and procedures

Following these reviews, institutions stated that they also developed or enhanced their internal QA system. This usually included development of the internal quality management system, integrated information system, quality system for curricular units, development of procedures for the monitoring of the quality and teaching, the launch of the first alumni survey, enhancement of the student feedback system, increased number of regional partnerships etc.

The institutions appreciated the reviewers approach to quality as development and not punishment, which set a positive incentive in taking in the outcomes of the review and allowed the institution to take forward ideas/plans for change.

Strengthening the institution's own responsibility for quality

Some of the institutions stated that they valued the opportunity to choose an agency that can promote more autonomy and underscore the responsibility of the institution for its own internal quality assurance processes.

The preparations have also fostered the self-reflection process, allowing the institution to identify possible problems (e.g. areas where universities' internal processes were uncoordinated) and providing an impetus to challenge the status-quo (e.g. review out-dated procedures and practices). This has often helped the top-management to reconsider its current working methods but it has also provided a stronger basis or an external pressure to follow-up on the external recommendations.

A positive add-on to the regular EQA

Voluntary cross-border EQA is also considered by one of the institutions as a positive add-on to the regular, obligatory external quality assurance exercise carried out by the national QAA. In cases where both the national and QAAs active across-borders followed the European Standards and Guidelines, the review process was not significantly different. However, when it comes to differences, the standards and criteria used by the international/foreign reviewers are perceived to be less rigid, more wide-ranging and also more outcome-oriented. If the international review was done in addition to the obligatory EQA, it was often considered helpful in the preparation for the national accreditation.

4.6 Challenges of a cross-border EQA

Extensive preparation phase

Considering the novelty of these reviews for some institutions, the preparation phase was very demanding. The biggest challenge was the extensive documentation. The preparation for the review entailed long and laborious work for the institutions and in particular for the self-evaluation steering groups (weekly meetings, several months of collecting data, consulting stakeholders, writing and redrafting chapters etc.). The length of the preparation depended on the type and complexity of the review. Single programme accreditation required a few months up to half a year, while institutional evaluations or institutional audit extended to a whole year. The documentation sometimes entailed extra

effort in the case of joint and double degree programmes due to the need to coordinate the review process with partnering countries.

Understanding of the national educational system

Since most QAAs were carrying out a cross-border EQA for the first time in the reviewed country, the institution had not only to prepare the regular self-evaluation report but also additional materials and explanation about the national context, background and specificities. The institutions invested considerable time and effort in supporting these preparations (e.g. translating documents, clarifying different understandings related to the national system or QA terminology for domain specific area).

To ensure an efficient and accurate review within the higher education system, institutions stated that they found the foreign QAA's preparation to be particularly helpful in improving the quality of the review (e.g. one QAA sent a list of open questions before the on-site visit inquiring about the specificities of the national legislation with regard to the reviewed programme). In some cases a technical preparation meeting was set up with the QAA before the site visit to assist with the preparation process.

Legislative context

The set up and coordination of the EQA of joint programmes presented particular challenges as it entailed overcoming national legislative barriers, national quality assurance frameworks and specific institutional regulations (e.g. taking into account expiry of programme accreditation, equivalence for grading systems etc.).

The recommendations were in some cases difficult to follow due to the legislative framework (e.g. the development of new specialisations required a royal decree).

A changing legislative context also created difficulty for the institution and the reviewers, altering the focus of the external review from the status of the current governance to the potential changes that would take place in the governance structure.

Language barriers

One additional challenge encountered by most institutions was related to the lack of available documentation in English (legislation, university strategy and documents etc.). The translation of the required documentation presented a number of difficulties due to the specific national terminology used in higher education and quality-related matters.

However, for some of the interviewed institutions the need to translate documents into English was not a specific challenge, as they were anyway required for reviews by the national QA agency involving international experts.

In preparing for the site-visit interviews, some institutions stated that they found it difficult for some of their staff to meet and discuss with the international review panel in English. To overcome this challenge an interpreter was often provided.

Complexity of the review

The institutions sometimes experienced two different approaches to quality assurance (i.e. national and international) that meant being assessed on similar standards that were differently defined and had a different weight for each of the reviewing agencies. Internalising the recommendations while taking into account two different perspectives on the results of the EQA, was considered rather confusing.

The bilingual approach of some reviews entailed double sets of self-evaluation reports. The interviewees admitted that a lengthier preparation was required due to this approach.

5. Conclusions

The final chapter aims at discussing key issues in terms of how institutions, agencies and policy makers interact in the field of cross-border external quality assurance with the aim to deliver high quality education. EQAR's role in safeguarding academic standards for cross-border quality provision is considered. The discussion with participants from the Seminar for QAAs and RIQAA Final Conference are also reflected in this chapter.

The ESG are a suitable reference framework for cross-border external QA activities. The revised ESG will continue to serve that purpose and underline agencies' responsibility for assuring the quality and integrity of their activities.

The ESG foster a common understanding of QA across borders and the promotion of a European dimension of QA while acknowledging the diversity of QA purposes and approaches. According to the MAP ESG project²² the ESG have been widely implemented across the EHEA, although to various degrees. They are perceived to be a useful and usable instrument that should maintain generic standards to respond to the many purposes of higher education.

The results of the QAA survey (further emphasised during the QAA seminar discussions) point to the use of the ESG as a reference framework for agencies' cross-border external QA activities. Agencies found that the ESG are considered suitable for that purpose.

The revised ESG are expected to reflect and continue to serve that purpose, while also reflecting the additional, important responsibilities for both higher education institutions and quality assurance agencies that arise from working together across borders. The revised ESG thus underline agencies' responsibility for assuring the quality and integrity of their activities.

Progress has been slow in EHEA countries allowing their higher education institutions to request accreditation, evaluation or audit from suitable EQAR-registered agencies.

The recognition of EQAR-registered agencies working within EHEA was one of the ideas underpinning the establishment of EQAR in the first place. This is visible in the developments in the national legal provisions even before the Bucharest Communiqué, with 9 countries recognising (under certain conditions) EQAR-registered agencies EQA activities. The Bucharest Communiqué indicates a strong recognition and support of the "Bologna infrastructure", consisting of the ESG and EQAR in quality assurance, which led ministers to further commit themselves to universally recognise EQAR-registered quality assurance agencies and their decisions.

Our analysis, however, shows that progress was slow, with only 25% of the signatory EHEA countries having put in place legislative provisions to allow (all or some) higher education institutions to request accreditation, evaluation or audit from suitable EQAR-registered agencies other than the national agency/agencies.

Even where such provisions exist there is not always clear and easily accessible information on the national EQA requirements. This is likely to hinder the activity of QAAs

²² Final report of the project Steering Group, Mapping the Implementation and Application of the ESG (MAP-ESG PROJECT), 2011, p. 60- 62

considering the additional effort needed to prepare for a cross-border QA review. Making available background information on national higher education systems and legislative requirements for the recognition of decisions and outcomes of QA reviews by non-national agencies was one of the key recommendations expressed by QAAs to facilitate the activities of agencies across borders. Similarly, additional effort is required from institutions as well, e.g. documents will need to be translated, site visits and interviews might take place in a different language than the institution's working language, the procedures and working culture of a foreign agency will be less familiar, and, finally, the review might be more expensive than a review by the national quality assurance agency.

In almost all cases where the country has made legal provisions recognising the cross-border EQA of registered agencies this is done with “strings attached” (e.g. additional licensing process for foreign agencies on top of EQAR registration, complex sets of national standards or criteria that have to be used in addition to the ESG, open only for joint programmes, only for transnational education etc.) This means that only a selected few can make use of the opportunities that cross-border QA offers.

75% of countries are reluctant to devolve any type of responsibility for external QA to an EQAR-registered QAA beyond their national boundary, while the QAA survey responses show that cross-border EQA is taking place in almost all EHEA countries (39 of 47 EHEA member countries). In these closed systems the cross-border EQA usually takes place in addition to the obligatory, national EQA. It might thus lead to an unproductive duplication of efforts.

Higher education institutions welcome if they can identify an agency that best suits their own mission and profile, which gives the most valuable feedback. A review by a foreign/international agency is perceived as a genuinely international experience, supporting the institution's international strategy and image.

Institutions have recognised that one benefit of selecting a QAA is the possibility to identify an agency that best suits their own mission and profile, and from which they believe to receive the most valuable feedback. This, in turn, increases the commitment of their internal and external stakeholders, and helps them develop their own quality culture. Further, the institutions felt that a review by a foreign/international agency was a more genuinely international experience, even if the national QA agency would include international peers on its panels. This is mainly based on the perception that the agency chosen has a broad pool of international peers and would clearly be seen as international by their stakeholders.

Some institutions welcomed the possibility of a review that would not have been available in that form in their country (e.g. award of an additional international label that is not available nationally). The main impact of such an international accreditation is reflected in a stronger connection with the labour market, benefiting students when they graduate, in terms of finding employment or continuing their academic career abroad more easily.

Institutions (especially small or regional ones) consider the review to strengthen their international profile and international partnerships. Related to this, the reputation and image of the agency chosen plays a certain role.

The internationalisation agenda has grown in importance within the EHEA with many higher education institutions now using cross-border EQA as a tool. In this cases cross-

border EQA serves as a double purpose: enhanced quality assurance and development of the institutions' internationalisation strategy.

There are additional challenges and effort required on the side of institutions, but these are outweighed by the additional benefits.

In terms of challenges higher education institutions consider the extra effort invested in explaining "their" system and context to a foreign agency and peers. Generally, a review by a foreign QA agency requires more time and effort than a review by the national QA agency. The issue of costs can be an inhibiting factor where a review by the national QA agency is free of charge, while a review by another EQAR-registered agency might be at the higher education institution's own expense.

The choice of a suitable agency usually involves considerable desk research for higher education institutions, for which institutions have used information provided on the EQAR website (e.g. expertise in different methodologies of external quality assurance, countries where agencies have worked) and on the agencies' own websites. Institutions often find themselves in the situation that only a small number of the (currently) 32 EQAR-registered agencies²³ would at all be suitable to undertake the review that is needed. Unless there are external requirements (i.e. procurement rules), however, the price of a review does not seem to be a determining factor for choosing an agency.

Nevertheless, institutions that choose to be reviewed by a foreign quality assurance agency see important advantages and opportunities that justify the extra effort required: receiving the best feedback, a review best suited to their own needs, or improved recognition of their qualifications.

The international dimension seems to be part of the daily life of almost all QAAs. Cross-border reviews can provide prestige, income or learning opportunities, also allowing agencies to improve their work in the national framework.

The international activities of QAAs extend from the participation in international quality assurance networks or bilateral cooperation to an increasing involvement in cross-border quality reviews for at least half of the surveyed agencies. The last five years have seen a rising trend of these reviews with 26 QAAs having carried out EQA activities in (at least) 39 of the 47 EHEA member states.

At the institutional level agencies are expected to balance autonomy and accountability, supporting the role and responsibility of the institution in the evaluation process and the implementation of recommendations²⁴. At the programme level, QAAs are expected to provide expertise and improve the (international) recognition of the delivered study programme.

When they carry out reviews across borders, QAAs bear a responsibility for delivering high quality reviews in less familiar QA frameworks. They, for instance, have to consider the levels of development of EQA frameworks, or an approach different from their own (e.g. enhancement vs. accreditation) and other possible strains (i.e. preference for a cross-border review and an aversion with the national QAA). Responding agencies have also acknowledged the risk of having the HEIs select a review due to its less strict

²³ EQAR listed agencies as of 25th July 2014

²⁴ Sursock, A., & Smidt, H., 2010, *Trends 2010. A decade of change in European Higher Education* (Brussels, EUA).

requirements. QAAs thus also have a responsibility to refuse a review in certain cases.

Cross-border reviews provide an added value to agencies in terms of prestige, income or learning opportunities. It allows them, to improve their understanding of quality and reflect on their experience back “home”, thus transferring their international expertise to the national framework. Agencies that have specialised in carrying out reviews across borders, have developed their image and offerings to meet their target group’s needs. This is regarded positively by most agencies, since it encouraged them to improve their processes so as to be most beneficial for the higher education institution or program under review, and to develop a clear presentation of their approach and its benefits for institutions.

QAAs as well have to invest additional resources and effort in preparing cross-border reviews. This especially applies when reviewing an institutions in a particular country for the first time. In their preparation most QAAs communicate with national authorities or QAAs in the target country. Amongst others, such preparation helps QAAs to avoid unintentional consequences due to lack of awareness of the contextual information.

Cross-border EQA often happens on an ad-hoc basis. There is a need for internationally active agencies to systematise their cross-border EQA activities.

Only 9 of the surveyed QAAs have a specific policy regarding their EQA activity abroad. A standardised approach to cross-border external QA, based on clear and specific policies and procedures could be expected of every agency operating cross-border. It, however, seems that for some agencies their priority is to carry out EQA activities “at home”. Cross-border reviews are therefore, sometimes secondary in focus. With an increase in the number of cross-border reviews, the quality of these reviews should be relevant not only for internationally oriented QAAs but also for national QAAs operating occasionally abroad.

While the publication of reports and decisions is general practice in national EQA activities, some agencies seem to be less stringent in that regards for cross-border EQA. When asked for further details about the quality assessments carried out (i.e. to provide a web link to the report of the external review carried out in foreign countries), QAAs offered such information for as little as 41% of cases. The publication of reports is more common among QAAs registered in EQAR (who have committed themselves to work in line with the European Standards and Guidelines) and less common to those who do not intend to be part of the Register.

During the discussions in the Final Conference (Palermo, 21/21 October 2014) it was emphasised that cross-border EQA is a growing phenomenon in the EHEA and that further mechanisms to support its development in a sustainable way would be needed.

6. Recommendations

The project has shown that a solid European foundation for cross-border quality assurance activities is in place, including the ESG and EQAR, together with other Bologna tools, especially the Qualifications Frameworks for the EHEA. Despite the commitments of the Bucharest Communiqué (2012) and EU ministers (Council conclusions of 2014), progress has been slow in opening national higher education systems to cross-border EQA and in recognising decisions from quality assurance agencies abroad.

Urgent action is, therefore, needed to lift current obstacles to cross-border EQA and enable the higher education institutions to work with a quality assurance agency that best suits their mission, profile and needs.

Confidence in external QA across the continent is not an end in itself, but should serve as a proxy to increase mutual trust amongst higher education institutions in their quality and the quality of study programmes.

EHEA ministers and governments are recommended to fully implement their commitments made in the Bucharest Conference and in particular to:

- recognise their higher education institutions' responsibility for their own quality and enable them to choose a non-national EQAR-registered quality assurance agency (in fulfilling their initial or periodic accreditation, evaluation or audit);
- recognise the use of ESG as a common basis for quality assurance in the EHEA and remove additional requirements on top of EQAR registration for quality assurance agencies before being able to operate in their country;
- provide clear and transparent information (in English as well) on the conditions under which foreign EQAR-registered agencies may operate in their country;
- review national regulations that present obstacles to the ESG-compliant external quality assurance framework, thus help their national agency/agencies to be compliant with the ESG by adapting legislation where necessary;
- strengthen EQAR by becoming Governmental Member and participating actively in the organisation's work.

Quality assurance agencies that operate across borders are recommended to:

- establish clear and transparent criteria and processes for evaluation, accreditation and audit abroad that are fully in line with the ESG (e.g. publication of decisions, follow-up procedures, appeals and complaints procedures);
- ensure consistency in using these criteria and processes, and to specify clearly what elements can be adapted based on the needs of a specific country or type of institution;
- ensure the publication of full reports for all cross-border reviews, also when another agency or authority makes the final decision;
- draw on existing good practice in cross-border reviews, such as inclusion of panel members with knowledge of the local context and appropriate communication with

the relevant national authorities, in their work;

- cover all their cross-border activities fully in their own periodic self-evaluation;

Higher education institutions are recommended to:

- ensure accountability and transparency in the choice of a suitable EQAR-registered agency and the preparation for the external QA review, involving fully their stakeholders;
- take full responsibility with regards to the results of the review, the follow-up and periodic review procedures;

EQAR is recommended to:

- pay full attention to quality assurance agencies' cross-border EQA activities (in line with the ESG) in considering their applications for registration and renewal;
- review the effectiveness of its tools for follow-up and monitoring of registered agencies' compliance with the ESG;
- enhance its provision of information for students, institutions, the labour market and society with regards to cross-border EQA activities of listed agencies including accessibility of the reports and results of these activities;
- report annually on the development of national frameworks for cross-border quality assurance across the EHEA and on the extent of registered agencies' activities across borders;
- invite ENQA, ESU, EUA, EURASHE, Business Europe and Education International to discuss recommendations for the cross-border activity of registered QAAs.

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Annex

1. Country codes

AL Albania	DE Germany	ME Montenegro
AM Armenia	DK Denmark	NL Netherlands
AT Austria	EE Estonia	PL Poland
AZ Azerbaijan	FI Finland	PT Portugal
BE nl Belgium – Flemish Community	KZ Kazakhstan	RO Romania
BG Bulgaria	LI Liechtenstein	TR Turkey
CH Switzerland	LT Lithuania	.
	MD Moldova	

ISO (International Organization for Standardization) code 3166. The country codes does not prejudice in any way the definitive nomenclature for each country, which is agreed following the conclusion of negotiations taking place under the auspices of the United Nations (http://www.iso.org/iso/country_codes/iso_3166_code_lists.htm)

2. Questionnaire sent to the following agencies

	Home country(ies)	Name of the QA agency	Acronym
1	Albania	Public Accreditation Agency for Higher Education	PAAHE
2	Armenia	National Center for Professional Education Quality Assurance Foundation (ANQA)	ANQA
3	Australia	Tertiary Education Quality and Standards Agency	TEQSA
4	Austria	Agency for Quality Assurance and Accreditation Austria	AQ Austria
5	Austria	European Association of Establishments for Veterinary Education	EAEVE
6	Belgium	Association Européenne des Conservatoires, Académies de Musique et Musikhochschulen	AEC
7	Belgium	European Chemistry Thematic Network Association	ECTN
8	Belgium	European Foundation for Management Development	EFMD
9	Belgium (Flemish speaking)	Quality Assurance Unit of the Flemish Council of Universities and University Colleges	VLUHR QAU
10	Belgium (French speaking)	Agence pour l'Evaluation de la Qualité de l'Enseignement Supérieur	AEQES
11	Bosnia and Herzegovina	Agency for development of higher educations and quality assurance	HEA
12	Bosnia and Herzegovina	Higher Education Accreditation Agency of Republika Srpska	HEAARS

	(Republika Srpska)		
13	Bulgaria	The National Evaluation and Accreditation Agency	NEAA
14	Croatia	Agency for Science and Higher Education	ASHE
15	Cyprus	Council of Educational Evaluation and Accreditation	CEEA
16	Czech Republic	Accreditation Commission Czech Republic	ACCR
17	Denmark	Danish Evaluation Institute	EVA
18	Denmark	The Danish Accreditation Institution	AI
19	Estonia	Estonian Higher Education Quality Agency	EKKA
20	Finland	Finnish Higher Education Evaluation Council	FINHEEC
21	France	Evaluation Agency for Research and Higher Education	AERES
22	France	Commission des Titres d'Ingénieur	CTI
23	France	International Assembly for Collegiate Business Education	IACBE
24	Georgia	National Center for Educational Quality Enhancement	NCEQE
25	Georgia	National Center for Education Quality Enhancement	NCEQE
26	Germany	Accreditation, Certification and Quality Assurance Agency	ACQUIN
27	Germany	Accreditation Agency in Health and Social Sciences	AHPGS
28	Germany	Evaluation Agency Baden-Württemberg Commission	evalag
29	Germany	Agency for Quality Assurance through Accreditation of Study Programmes	AQAS
30	Germany	Akkreditierungsagentur für Studiengänge der Ingenieurwissenschaften, der Informatik, der Naturwissenschaften und der Mathematik	ASIIN
31	Germany	Foundation for International Business Administration Accreditation	FIBAA
32	Germany	Zentrale Evaluations- und Akkreditierungsagentur Hannover	ZEVA
33	Germany	European Evangelical Accrediting Association	EEAA
34	Germany	European Council on Chiropractic Education	ECCE
35	Hong Kong SAR	The Hong Kong Council for Accreditation of Academic and Vocational Qualification	HKCAAVQ
36	Hungary	Hungarian Accreditation Committee	HAC
37	India	National Assessment and Accreditation Council	NAAC
38	Ireland	Quality and Qualifications Ireland	QQI
39	Israel	Council for Higher Education	
40	Japan	National Institution for Academic Degrees and University Evaluation	NIAD-UE
41	Japan	National Institution for Academic Degrees and University Evaluation	NIAD-UE
42	Kazakhstan	Independent Agency for Accreditation and Rating	IAAR

43	Kazakhstan	Independent Kazakhstan Quality Assurance Agency in Education	IQAA
44	Kosovo	Kosovo Accreditation Agency	KAA
45	Latvia	Higher Education Quality Evaluation Centre	AIKNC
46	Lithuania	Centre for Quality Assessment in Higher Education	SKVC
47	Netherlands	Accreditation Organisation of the Netherlands and Flanders	NVAO
48	Netherlands	European Association for Public Administration Accreditation	EAPAA
49	Netherlands	Quality Assurance Netherlands Universities	QANU
50	Netherlands	Netherlands Quality Agency	NQA
51	Northern Cyprus	Higher Education Planning, Evaluation, Accreditation and Coordination Council	YÖDAK
52	Norway	Norwegian Agency for Quality in Education	NOKUT
53	Norway	Norwegian Agency for Quality Assurance in Education	NOKUT
54	Philippines	Commission on Higher Education	
55	Philippines	Philippine Accrediting Association of Schools, Colleges and Universities	PAASCU
56	Poland	Polish Accreditation Committee	PKA
57	Puerto Rico	Council on Education	CEPR
58	Romania	Romanian Agency for Quality Assurance in Higher Education	ARACIS
59	Russia	The Agency for Higher Education Quality Assurance and Career Development	AKKORK
60	Russia	National Centre for Public Accreditation	NCPA
61	Russia	National Accreditation Agency	NAA
62	Serbia	Commission for Accreditation and Quality Assurance	CAQA
63	Slovak Republic	The Accreditation Commission, advisory body of the government of the Slovak Republic	ACSR
64	Slovenia	Slovenian Quality Assurance Agency	SQAA
65	Spain	Agencia Nacional de Evaluación de la Calidad y Acreditación	ANECA
66	Spain	Agencia Andaluz del Conocimiento	AAC-DEVA
67	Spain (Basque country)	Basque University System Quality Agency	Unibasq
68	Spain (Castile and León)	Quality Assurance Agency for the University System of Castilla y León	ACSUCYL
69	Spain (Catalonia)	Agency for Quality Assurance in the University System of Catalunya	AQU
70	Spain (Galicia)	Agency for Quality Assurance in the Galician University System	ACSUG

71	Sweden	The Swedish Higher Education Authority	UK Ambetet
72	Switzerland	Institutional Evaluation Programme, IEP	IEP
73	Switzerland	Swiss Center of Accreditation and Quality Assurance in Higher Education	OAQ
74	Switzerland	European Evangelical Accrediting Association	EEEEA
75	Turkey	Association for Evaluation and Accreditation of Engineering Programs	MÜDEK
76	United Arab Emirates	Commission for Academic Accreditation	CAA
77	United Kingdom	The Quality Assurance Agency	QAA
78	United Kingdom	British Accreditation Council	BAC
79	United States	Teacher Education Accreditation Council	TEAC
80	United States of America	Association of Collegiate Business Schools and Programs	ACBSP
81	United States of America	The Accrediting Council for Independent Colleges and Schools	ACICS
82	United States of America	Accreditation Board for Engineering and Technology	ABET
83	United States of America	The Association for Biblical Higher Education	ABHE
84	United States of America	Middle States Commission on Higher Education	MSCHE
85	United States of America	Association to Advance Collegiate Schools of Business	AACSB International

3. Abbreviations

	Full name/ description
CeQuint	Assessment of Quality in Internationalisation
QUEST	Quest for Quality for Students
Grossroads	Information regarding quality assured and accredited higher education in Europe
MULTRA	Mutual Recognition of Accreditation Results regarding Joint Programmes
ECAPEDIA	A portal dedicated for higher education issues in quality assurance
IMPALA	Impact Analysis of External Quality Assurance Processes of Higher Education Institutions
NOQA	Nordic Quality Assurance Network in Higher Education
GICAQ	Global Initiative on Quality Assurance Capacity

QACHE	Quality Assurance of Cross-border Higher Education
ESABIH	European Union Standards for Accreditation of Study Programmes at BiH Universities
ENQA	European Association for Quality Assurance in Higher Education
CEENQA	Central and Eastern European Network of Quality Assurance Agencies
ECA	The European Consortium for Accreditation in higher education
REACU	Spanish Network for Quality Assurance Agencies in Higher Education
INQAAHE	The International Network for Quality Assurance Agencies in Higher Education
ANQAHE	The Arab Network for Quality Assurance in Higher Education

4. Glossary

E4 Group	The E4 group refers to four European stakeholders in higher education: The European Association for Quality Assurance in Higher Education (ENQA), the European Students' Union (ESU), the European University Association (EUA) and the European Association of Institutions in Higher Education (EURASHE).
European Higher Education Area (EHEA)	Launched along with the Bologna Process' decade anniversary during the Budapest-Vienna Ministerial Conference in March 2010 by 47 states, together with the European Commission, and the consultative members, namely the Council of Europe, UNESCO, EUA, ESU, EURASHE, ENQA, Education International and BUSINESSEUROPE. EHEA is meant to ensure more comparable, compatible and coherent systems of higher education in Europe.
European Quality Assurance Register for Higher Education (EQAR)	The Register aims at increasing transparency of quality assurance in higher education across Europe. It has been founded in 2008 by the European Association for Quality Assurance in Higher Education (ENQA), the European Students' Union (ESU), the European University Association (EUA) and the European Association of Institutions in Higher Education (EURASHE). EQAR publishes and manages a list of quality assurance agencies that substantially comply with the European Standards and Guidelines for Quality Assurance (ESG) to provide clear and reliable information on quality assurance agencies operating in EHEA.
European Standards and Guidelines for Quality Assurance in the	European Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG) are an agreed set of standards and guidelines for quality assurance in European

European Higher Education Area (ESG)	higher education. They were developed by the "E4 Group" and adopted by the ministers in Bergen in 2005.
External Quality Assurance (EQA)	External quality assurance refers to the process of evaluation or audit of a higher education programme or institution undertaken by a specialised body outside the institution. Typically the body may be a quality assurance or accreditation agency, or an ad hoc panel of experts and peers constituted by the responsible Ministry. The evaluation will involve the collection of data, information and evidence for assessment against agreed standards.
Higher education institution (HEI):	All post-secondary institutions (ISCED levels 5 and 6) awarding higher degrees (Bachelor, Master's and/or doctorate) irrespective of their name and status in national law.
Joint programmes	Programmes that are developed and implemented jointly by several institutions in different countries.
Joint degree	A higher education qualification issued jointly by at least two or more higher education institutions or jointly by one or more higher education institutions and other awarding bodies.
National Qualification Framework (NQF)	National qualifications frameworks describe qualifications in terms of level, workload, learning outcomes and profile. They relate qualifications and other learning achievements in higher education coherently and are internationally understood.
Quality assurance (QA):	An all-embracing term referring to processes of evaluating (assessing, monitoring, guaranteeing, maintaining and improving) the quality of a higher education system, institution or programme.
Quality assurance agency (QAA)	A body established by public authorities with responsibility for external quality assurance. Agencies are intended to play a strong role in ensuring accountability of higher education institutions and may have specific objectives and developmental roles regarding enhancing quality.
Quality culture	Quality culture refers to a set of shared values that guide the process of monitoring and improvement quality in higher education institutions and other organisations .
Regulation	A law, decree or any other officially binding document, issued by the top-level education authorities.